

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

v.

SEAN JOSEPH MCMANUS,
dob 06/08/72;

JUSTIN KENT SCHMITT,
dob 11/26/82;

JASON ALAN SCHROCK,
dob 05/03/75;

ELI RALPH JOHNSON,
dob 09/09/65;

RICHARD BA NGUYEN,
dob 07/09/86;

NYLA JUNE CRIDER,
dob 10/15/73;

STEVEN BRAIN ZANT,
dob 08/25/62
aka STEVE VAN ZANT;

MICHELLE CLAUDIA KALEHUA KUKAHIKO,
dob 05/28/82;

KEALII TROY KUKAHIKO,
dob 01/26/73;

NANCY CAROLE HAUER,
dob 04/26/62;

ROBERT JOHN WILLIAMS,
dob 03/11/54;

Defendants

CT No. SCD266439
DA No. AEM242

INDICTMENT

FILED
MAY 17 2019
DYS. C. KILPATRICK

PC296 DNA TEST STATUS SUMMARY

<u>Defendant</u>	<u>DNA Testing Requirements</u>
MCMANUS, SEAN JOSEPH	DNA sample required upon conviction
SCHMITT, JUSTIN KENT	DNA sample required upon conviction
SCHROCK, JASON ALAN	DNA sample required upon conviction
JOHNSON, ELI RALPH	DNA sample required upon conviction
NGUYEN, RICHARD BA	DNA sample required upon conviction
CRIDER, NYLA JUNE	DNA sample required upon conviction
ZANT, STEVEN BRAIN	DNA sample has been previously provided
KUKAHIKO, MICHELLE CLAUDIA KALEHUA	DNA sample required upon conviction
KUKAHIKO, KEALII TROY	DNA sample required upon conviction
HAUER, NANCY CAROLE	DNA sample required upon conviction
WILLIAMS, ROBERT JOHN	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 - CONSPIRACY TO COMMIT A CRIME

On or about and between January 1, 2016 and April 20, 2018, SEAN JOSEPH MCMANUS, JUSTIN KENT SCHMITT, JASON ALAN SCHROCK, NYLA JUNE CRIDER, MICHELLE CLAUDIA KALEHUA KUKAHIKO, and KEALII TROY KUKAHIKO did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Theft of Public Funds, Penal Codes Section 424 Prodigy Athletes, in violation of PENAL CODE SECTION 182(a)(1).

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

The object of the conspiracy was to misappropriate public funds by falsely claiming and obtaining apportionment funding for students attending charter schools when the students were not receiving charter school services at the time claimed. Conspirators knowingly paid pre-existing athletic organizations for student report cards and falsified charter school enrollment documentation which allowed the conspirators to request and obtain state funding for the athletic participants over summer under false cover of them being students of charter schools. Conspirators knowingly obtained state funding for children who were not assigned certificated teachers as required by law, were not in contact with the charter school, and who were not provided any educational services during the dates claimed.

OVER ACT NO. (1): On or about November 2016, JASON SCHROCK and SEAN MCMANUS, through the corporation Academics, Arts and Action Charter Academy, purchased the rights from Foundation Learning LLC to manage, operate, and collect public funds from two charter schools, Mosaica Online Academy of Southern California and Mosaica Online Academy of Los Angeles.

CHARGES (cont'd)

OVER ACT NO. (2): On or about December 5, 2016, David Foster filed Articles of Incorporation for Online Academy of Los Angeles (C3966286) with the State of California.

OVER ACT NO. (3): On or about December 5, 2016, business filing for Online Academy of Los Angeles (C3966286) listed JASON SCHROCK as the Agent for service of process.

OVER ACT NO. (4): On or about December 5, 2016, Caitlin Alexander filed Articles of Incorporation for Online of Southern California (C3966287) with the State of California.

OVER ACT NO. (5): On or about December 5, 2016, business filing for Online of Southern California (C3966287) listed JASON SCHROCK as the Agent for service of process.

OVER ACT NO. (6): On or about December 30, 2016 the corporate governing board for Mosaica Online Academy of Southern California (Charter School), Mosaica Online Academy of Southern California (Corporation C3216022), merged with the corporation Online of Southern California (C3966287) and dissolved, leaving Online of Southern California (C3966287) as the surviving corporation.

OVER ACT NO. (7): On or about December 30, 2016 the corporate governing board for Mosaica Online Academy of Los Angeles (Charter School), Mosaica Online Academy of Los Angeles (Corporation C3694447), merged with the corporation Online Academy of Los Angeles (C3966286) and dissolved, leaving Online Academy of Los Angeles (C3966286) as the surviving corporation.

OVER ACT NO. (8): On or about August 2, 2017, Online Academy of Southern California (C3966287) changed its name to Valiant Academy San Diego.

OVER ACT NO. (9): On or about August 2, 2017, Online Academy of Los Angeles (C3966286) changed its name to Valiant Academy LA.

OVER ACT NO. (10): On or about and between November 2016, and April 2018, Mosaica Online Academy of Southern California (Charter School) operated under the names: Valiant Academy Southern California, Valiant Academy San Diego, Valiant Preparatory Academy Southern California, Valiant Preparatory Academy San Diego, Valiant Prep Southern California, Valiant Prep San Diego, Valiant DESD, Valiant San Diego, and Valiant Academy San Diego all of which are the same charter school authorized by Dehesa Elementary School District.

OVER ACT NO. (11): On or about and between November, 2016 and April, 2018, Mosaica Online Academy of Los Angeles (Charter School) operated under the names: Valiant Academy Los Angeles, Valiant Academy Los Angeles, Valiant Preparatory Academy, Valiant Preparatory Academy Los Angeles, Valiant Prep Los Angeles, Valiant Prep LA, Valiant LA, all of which are Valiant Academy Los Angeles and was the same charter school authorized by Acton Agua Dulce Unified School District.

OVER ACT NO. (12): On or about September 25, 2017, JASON SCHROCK and Eli Johnson signed an account agreement with Farmers and Merchants Bank to open a bank account for Valiant Academy San Diego, bank account number ****2497.

CHARGES (cont'd)

OVER ACT NO. (13): On or about October 19, 2017, JASON SCHROCK and Eli Johnson signed an account agreement with Farmers and Merchants Bank to open a bank account for Valiant Academy LA, bank account number****2462.

OVER ACT NO. (14): On or about April 24, 2017, SEAN MCMANUS and JASON SCHROCK hired NYLA CRIDER to expand enrollment in Valiant Charter Schools.

OVER ACT NO. (15): On or about April 24, 2017, SEAN MCMANUS texted NYLA CRIDER to congratulate her for joining the team.

OVER ACT NO. (16): On or about April 24, 2017, NYLA CRIDER texted SEAN MCMANUS she was excited about making Valiant Charter Schools the most sought after charter school.

OVER ACT NO. (17): On or about April 24, 2017, SEAN MCMANUS directed NYLA CRIDER via text to get going on summer school.

OVER ACT NO. (18): On or about April 27, 2017, NYLA CRIDER texted JASON SCHROCK and SEAN MCMANUS regarding her son's football program so they could try to recruit the football program to participate in Valiant Charter Schools' summer credit recovery program.

OVER ACT NO. (19): On or about May 6, 2017, SEAN MCMANUS texted NYLA CRIDER to tell a teacher he would help her obtain "high quality teacher" status if she came to Valiant Charter Schools and brought 30 students with her.

OVER ACT NO. (20): On or about May 8, 2017, JASON SCHROCK and SEAN MCMANUS explained to NYLA CRIDER via text that a master agreement, birth certificate and proof of address was needed to enroll kids in the summer program for Valiant Charter Schools.

OVER ACT NO. (21): On or about May 9, 2017, KALEHUA KUKAHIKO was hired by Valiant Academy as a registrar for a salary of \$50,000.

OVER ACT NO. (22): On or about May 12, 2017, SEAN MCMANUS texted NYLA CRIDER not to end Valiant Charter Schools' summer program on August 21, 2017, because they would have students from other private and charter school throughout southern California who would return to their schools in the Fall on a wide variety of dates.

OVER ACT NO. (23): On or about June 8, 2017, SEAN MCMANUS texted NYLA CRIDER about enrollment, encouraging her to "keep it rocking."

OVER ACT NO. (24): On or about June 10, 2017, SEAN MCMANUS texted NYLA CRIDER he would pay \$25,000 to a high school booster club if they could bring over 1,000 students to Valiant Charter Schools.

CHARGES (cont'd)

OVER ACT NO. (25): On or about June 10, 2017, NYLA CRIDER discussed with KALEHUA KUKAHIKO if San Juan Hills High School would be interested in coming to Valiant Charter Schools.

OVER ACT NO. (26): On or about June 10, 2017, KALEHUA KUKAHIKO texted NYLA CRIDER that she would “pitch” the idea to recruit San Juan Hills High School to her husband, TROY KUKAHIKO.

OVER ACT NO. (27): On or about June 29, 2017, SEAN MCMANUS approved via text NYLA CRIDER allowing teachers to supervise 60, 64 and 71 students during the summer.

OVER ACT NO. (28): On or around June 29, 2017, NYLA CRIDER exceeded the allowable teacher to student ratio under the Education Code with her staff at Valiant Charter Schools because they didn’t have enough teachers for the amount of students they had enrolled.

OVER ACT NO. (29): On or about July 3, 2017, TROY KUKAHIKO and NYLA CRIDER agreed to use Prodigy Athletes as a vendor of Valiant Charter Schools so Prodigy Athletes could “donate” money back to participating organizations to help recruit them.

OVER ACT NO. (30): On or about July 3, 2017, NYLA CRIDER authorized TROY KUKAHIKO to backdate student registration dates to July 1, 2017, for students recruited by Prodigy Athletes.

OVER ACT NO. (31): On or about July 10, 2017, TROY KUKAHIKO filed Articles of Incorporation on behalf of Prodigy Athletes Foundation.

OVER ACT NO. (32): On or about July 11, 2017, Prodigy athletes applied as a vendor with Valiant Charter Schools.

OVER ACT NO. (33): One or about July 12, 2017, SEAN MCMANUS approved via text, that NYLA CRIDER provide full funding to high school athletes that enrolled by August 1, 2017, as long as their registration documents were all backdated to July 1, 2017.

OVER ACT NO. (34): On or about July 12, 2017, SEAN MCMANUS gave NYLA CRIDER an immediate \$25,000 raise and set enrollment benchmarks for bonuses up to an additional \$30,000.

OVER ACT NO. (35): On or about July 12-13, 2017, NYLA CRIDER, TROY KUKAHIKO, KALEHUA KUKAHIKO, and San Juan Hills High School teacher and head football coach, Aaron Flowers, collaborated to create an email to send parents of San Juan Hills High School football players explaining Prodigy Athletes’ summer program with Valiant Charter Schools.

OVER ACT NO. (36): On or about July 12-13, 2017, Aaron Flowers agreed with NYLA CRIDER to act as Valiant’s teacher of record for the Prodigy Athlete’s summer course.

OVER ACT NO. (37): On or about July 12-13, 2017, SEAN MCMANUS told NYLA CRIDER Valiant Charter Schools could pay the booster club directly and didn’t need to employ Aaron Flowers.

CHARGES (cont'd)

OVER ACT NO. (38): On or about July 12-13, 2017, Prodigy Athletes TROY KUKAHIKO agreed to give the San Juan Hills High School football team \$200 for each athlete that signed up with Prodigy Athletes.

OVER ACT NO. (39): On or about July 13, 2017, NYLA CRIDER and KALEHUA KUKAHIKO emailed Aaron Flowers a Master Agreement (MA) form with the course start date and student, parent, and supervising teacher signature dates already listed as July 1, 2017, so the forms would be appropriately backdated for Valiant Charter Schools.

OVER ACT NO. (40): On or about July 13, 2017, NYLA CRIDER asked TROY KUKAHIKO to create a course name for Prodigy Athletes' summer program with Valiant Charter Schools, even though the course was supposed to have started on July 1, 2017.

OVER ACT NO. (41): On or about July 13, 2017, KALEHUA KUKAHIKO advised NYLA CRIDER that TROY KUKAHIKO decided to name the course Students With Academic Goals (SWAG).

OVER ACT NO. (42): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER asking about Valiant's enrollment numbers.

OVER ACT NO. (43): On or about July 13, 2017, NYLA CRIDER reported to SEAN MCMANUS via text that Valiant's enrollment was 1,224 but would increase once the high school athletes came in.

OVER ACT NO. (44): On or about July 13, 2017, NYLA CRIDER texted SEAN MCMANUS she just recruited two more "big football programs" for the summer.

OVER ACT NO. (45): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER to recruit as many high school teams as she could.

OVER ACT NO. (46): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER "go hard" for next six weeks and make sure all documents were dated July 1, 2017.

OVER ACT NO. (47): On or about July 13, 2017, NYLA CRIDER texted SEAN MCMANUS "I will" in response to SEAN MCMANUS's direction to "go hard."

OVER ACT NO. (48): On or about July 16, 2017, TROY KUKAHIKO emailed Raymond Toilolo, football coach at Helix High School about Prodigy Athletes' SWAG Program.

OVER ACT NO. (49): On or about July 17, 2017, TROY KUKAHIKO emailed Vincent Lobendahn, football coach at John Glenn High School about Prodigy Athletes' SWAG Program.

OVER ACT NO. (50): On or about July 20, 2017, TROY KUKAHIKO emailed Jason Negro, football coach for John Bosco High School about Prodigy Athletes' SWAG Program.

CHARGES (cont'd)

OVER ACT NO. (51): On or about July 17, 2017, Aaron Flowers emailed San Juan Hills High School football families advising all 9th to 12th grade boys would be participating in Prodigy Athletes' SWAG program. Parents were directed to complete the Master Agreement (MA), which showed the start date for the course as July 1, 2017 and end date as August 21, 2017.

OVER ACT NO. (52): On or about July 17, 2017, several San Juan Hills High School parents emailed Aaron Flowers to express concerns regarding Prodigy Athletes' SWAG program.

OVER ACT NO. (53): On or about July 17, 2017, Flowers sought guidance from NYLA CRIDER, KALEHUA KUKAHIKO, and TROY KUKAHIKO on how to respond to the concerned San Juan Hills High School parents.

OVER ACT NO. (54): On or about July 17, 2017, NYLA CRIDER consulted with SEAN MCMANUS on how Aaron Flowers should respond to the concerned San Juan Hills High School parents.

OVER ACT NO. (55): On or about July 17, 2017, TROY KUKAHIKO emailed NYLA CRIDER, KALEHUA KUKAHIKO and Aaron Flowers and stated the SWAG "components" were built into the current San Juan Hills High School football program and didn't require students to spend any time outside of football practice.

OVER ACT NO. (56): On or about July 17, 2017, Aaron Flowers responded to the concerned San Juan Hills High School football parents and notified all families that participation in Prodigy Athletes' SWAG program was voluntary and not mandatory.

OVER ACT NO. (57): On or around July 17, 2017, San Juan Hills High School parent Elizabeth Eaton was unaware she was being asked and ultimately signed her child up for a charter school as part of Prodigy Athletes' SWAG program.

OVER ACT NO. (58): On or around July 17, 2017, San Juan Hills High School parent Keri Schneeweiss did not sign up her child up for the Prodigy Athletes SWAG program, but ultimately received the same services from San Juan Hills High School and Prodigy for football services.

OVER ACT NO. (59): On or about July 17, 2017, SEAN MCMANUS texted NYLA CRIDER to offer full funds to summer enrollees as long their paperwork was backdated to July 1, 2017.

OVER ACT NO. (60): On or about July 18, 2017, NYLA CRIDER texted SEAN MCMANUS Valiant Charter Schools could be receiving another 200-400 students from Prodigy Athletes.

OVER ACT NO. (61): On or about July 18, 2017, SEAN MCMANUS texted NYLA CRIDER to focus on recruiting as many of the athletic folks as she could.

OVER ACT NO. (62): On or about July 18, 2017, TROY KUKAHIKO texted NYLA CRIDER advising Valiant Charter Schools could pay him \$700 per participant which included Prodigy Athletes' \$500 fee and the \$200 Valiant was giving to the participating organization.

CHARGES (cont'd)

OVER ACT NO. (63): On or about July 18, 2017, TROY KUKAHIKO texted NYLA CRIDER suggesting he could write a check from Prodigy Athletes to the participating organization to pass through Valiant Charter School's \$200 contribution.

OVER ACT NO. (64): On or about July 18, 2017, NYLA CRIDER texted TROY KUKAHIKO that she would let him know how payments would be disbursed once she checked with SEAN MCMANUS.

OVER ACT NO. (65): On or about July 18, 2017, TROY KUKAHIKO texted NYLA CRIDER that John Glenn High School agreed to sign up for Prodigy Athletes' SWAG program.

OVER ACT NO. (66): On or about July 19, 2017, Assistant Principal Leonard Shryock from John Glenn High School emailed KALEHUA KUKAHIKO with questions about Prodigy Athletes' SWAG program, including the length of the program, the funding source of the \$200 payment to John Glenn High School's football team, and the curriculum involved.

OVER ACT NO. (67): On or about July 19, 2017, KALEHUA KUKAHIKO consulted with NYLA CRIDER and TROY KUKAHIKO on how to respond to Leonard Shryock's questions about SWAG.

OVER ACT NO. (68): On or about July 19, 2017, NYLA CRIDER approved KALEHUA KUKAHIKO's prepared response to Leonard Shryock's questions about SWAG.

OVER ACT NO. (69): On or about July 19, 2017, KALEHUA KUKAHIKO sent a letter to Leonard Shryock, as the Registrar and College Planning Advisor for Valiant Preparatory, in response to Leonard Shryock's questions about SWAG.

OVER ACT NO. (70): On or about July 19, 2017, KALEHUA KUKAHIKO in her letter to Leonard Shryock, Kukahiko explained SWAG was a summer only program and Prodigy Athletes was a "board approved" vendor of Valiant so whatever curriculum Prodigy Athletes integrated into the summer program met Valiant Charter School's requirements.

OVER ACT NO. (71): On or about July 19, 2017, KALEHUA KUKAHIKO in her letter to Leonard Shryock explained told Leonard Shryock that Prodigy Athletes Foundation was a non-profit corporation and was donating money back to the participating programs at their own discretion and the funds were not coming from a public charter school.

OVER ACT NO. (72): On or about July 19, 2017, NYLA CRIDER told Maureen Williams that, if she reached her bonus goal, she would be the highest paid employee at Valiant Charter Schools.

OVER ACT NO. (73): On or about July 19, 2017, TROY KUKAHIKO emailed George Malau'ulu, President of the AIGA Foundation about Prodigy Athletes' SWAG Program.

OVER ACT NO. (74): On or about July 21, 2017, TROY KUKAHIKO texted NYLA CRIDER to inquire if Prodigy Athletes was an approved vendor with Valiant Charter Schools.

CHARGES (cont'd)

OVER ACT NO. (75): On or about July 21, 2017, NYLA CRIDER texted Valiant Charter Schools' Vendor Relations Coordinator, Dana Hughes, and asked what needed to be done to approve Prodigy Athletes as a vendor.

OVER ACT NO. (76): On or about July 21, 2017, NYLA CRIDER told Dana Hughes that KALEHUA KUKAHIKO was the vendor contact for Prodigy Athletes and KALEHUA KUKAHIKO had already completed her live scan as an employee of Valiant Charter Schools.

OVER ACT NO. (77): On or about July 21, 2017, Dana Hughes texted NYLA CRIDER Prodigy Athletes was formally approved as a Valiant Charter Schools vendor.

OVER ACT NO. (78): On or about July 27, 2017, TROY KUKAHIKO texted NYLA CRIDER he was working on recruiting three other programs in addition to the three he already had.

OVER ACT NO. (79): On or about August 4, 2017, NYLA CRIDER texted SEAN MCMANUS to report Valiant Charter Schools had 1,410 total enrollments, with fall enrollments of 377.

OVER ACT NO. (80): On or about August 4, 2017, NYLA CRIDER and SEAN MCMANUS discussed paying referral fees to parents who referred students to Valiant Charter Schools.

OVER ACT NO. (81): On or about August 9, 2017, NYLA CRIDER texted SEAN MCMANUS a summary of Prodigy Athletes' summer enrollment numbers.

OVER ACT NO. (82): On or about August 9, 2017, NYLA CRIDER requested KALEHUA KUKAHIKO give her the SWAG Master Agreement's, transcripts and work samples Prodigy Athletes collected so she could determine how much Valiant Charter Schools owed each organization and TROY KUKAHIKO.

OVER ACT NO. (83): On or about August 9, 2017, KALEHUA KUKAHIKO texted NYLA CRIDER that Aaron Flowers (San Juan Hills High School) was suffering from A3 doubt and thought the \$200 he was promised per participant was too good to be true.

OVER ACT NO. (84): OVERT ACT NO. (100): On or about August 9, 2017, NYLA CRIDER texted SEAN MCMANUS about Coach Aaron Flowers' concerns the \$200 per participant he was promised was too good to be true.

OVER ACT NO. (85): OVERT ACT NO. (101): On or about August 9, 2017, SEAN MCMANUS texted NYLA CRIDER that he would write the check to Aaron Flowers in blood if he had to.

OVER ACT NO. (86): On or about August 9, 2017, SEAN MCMANUS texted NYLA CRIDER he wanted Valiant Charter Schools to have 2,500 students enrolled by next summer.

OVER ACT NO. (87): On or about August 10, 2017, NYLA CRIDER texted Aaron Flowers to advise she was getting ready to submit an invoice to obtain a check for the \$200 per student Valiant Charter Schools promised to pay to the San Juan Hills High School football program.

CHARGES (cont'd)

OVER ACT NO. (88): On or about August 10, 2017, NYLA CRIDER texted Aaron Flowers she wanted to bring the JASON SCHROCK, President of Valiant Charter Schools with her when they delivered the check to him.

OVER ACT NO. (89): On or about August 10, 2017, TROY KUKAHIKO submitted his first invoice to NYLA CRIDER for payment for SWAG.

OVER ACT NO. (90): On or about August 10, 2017, NYLA CRIDER asked TROY KUKAHIKO to adjust the Prodigy Athletes SWAG invoices to show they were for "Educational Services."

OVER ACT NO. (91): On or about August 12, 2017, KALEHUA KUKAHIKO emailed the corrected Prodigy Athletes SWAG invoices to NYLA CRIDER with the phrase "Educational Services".

OVER ACT NO. (92): On or about August 12, 2017, TROY KUKAHIKO and KALEHUA KUKAHIKO submitted a Prodigy Athletes SWAG invoice for \$71,000 to Valiant Charter Schools for 142 participants from San Juan Hills High School, John Glenn High School, Rancho Santa Margarita Pop Warner, AIGA Foundation, and Jesse Sapolu Foundation.

OVER ACT NO. (93): On or about August 13, 2017 TROY KUKAHIKO texted NYLA CRIDER to confirm the sports programs would receive \$200 from Prodigy Athletes and \$200 from Valiant Charter Schools per participant.

OVER ACT NO. (94): On or about August 13, 2017, TROY KUKAHIKO texted NYLA CRIDER he had a identified a coach who could bring another 100 kids to Prodigy Athletes' SWAG program by the following week.

OVER ACT NO. (95): On or about August 13, 2017, NYLA CRIDER texted TROY KUKAHIKO Valiant Charter Schools would continue to accept additional students into their summer program.

OVER ACT NO. (96): On or about August 15, 2017, NYLA CRIDER told TROY KUKAHIKO to backdate the Master Agreements for all Prodigy Athletes' SWAG participants to July 1, 2017, and get them to her by August 30, 2017.

OVER ACT NO. (97): On or about August 15, 2017, NYLA CRIDER emailed the Prodigy Athletes invoice she received from TROY KUKAHIKO and KALEHUA KUKAHIKO to RICHARD NGUYEN and SEAN MCMANUS.

OVER ACT NO. (98): On or about August 15, 2017, NYLA CRIDER asked RICHARD NGUYEN and SEAN MCMANUS to immediately pay Prodigy Athletes \$36,000 to cover the \$200 per participant Prodigy Athletes owed to the first group of organizations and to provide a little extra money for TROY KUKAHIKO.

OVER ACT NO. (99): OVERT ACT NO. (115): On or about August 16, 2017, RICHARD NGUYEN texted NYLA CRIDER and asked if SEAN MCMANUS approved the \$16,600 invoice she submitted for payment to San Juan Hills High School.

CHARGES (cont'd)

OVER ACT NO. (100): OVERT ACT NO. (116): On or about August 16, 2017, NYLA CRIDER responded to RICHARD NGUYEN "Yes" indicating SEAN MCMANUS approved the \$16,600 payment to San Juan Hills High School.

OVER ACT NO. (101): OVERT ACT NO. (117): On or about August 16, 2017, RICHARD NGUYEN told NYLA CRIDER from that point forward they would issue just one check to Prodigy Athletes to cover what Valiant Charter Schools owed Prodigy Athletes and the participating organizations.

OVER ACT NO. (102): OVERT ACT NO. (118): On or about August 16, 2017, RICHARD NGUYEN issued a \$16,600 check from Mosaica Online Academy of Southern California (the former corporate name of Valiant Academy of Southern California) to Stallion Booster Club (San Juan Hills High School) as payment for 83 Prodigy Athletes SWAG participants.

OVER ACT NO. (103): On or about August 18, 2017, RICHARD NGUYEN emailed SEAN MCMANUS and asked if the invoice was approved to immediately pay Prodigy Athletes \$36,000 to cover the \$200 per participant Prodigy Athletes owed the first group of organizations.

OVER ACT NO. (104): On or about August 18, 2017, SEAN MCMANUS emailed RICHARD NGUYEN and directed him and NYLA CRIDER to write the Prodigy Athletes SWAG invoice and send it to him with the unit math explained.

OVER ACT NO. (105): On or about August 22, 2017, NYLA CRIDER texted TROY KUKAHIKO she was in a meeting with the "high ups" and needed updated SWAG enrollment numbers.

OVER ACT NO. (106): On or about August 22, 2017, TROY KUKAHIKO texted NYLA CRIDER he had 30 enrollments from Toalei Talatana in San Diego and expected 70 more enrollments.

OVER ACT NO. (107): On or about August 22, 2017, TROY KUKAHIKO told NYLA CRIDER he also had 25 participants coming from Infinity Cheerleading later that day.

OVER ACT NO. (108): On or about August 22, 2017, NYLA CRIDER asked TROY KUKAHIKO to provide a Google Drive link so she could access and review the SWAG student registration documents.

OVER ACT NO. (109): On or about August 22, 2017, TROY KUKAHIKO provided NYLA Crider with a Google Drive link to the Prodigy Athletes SWAG student documents.

OVER ACT NO. (110): On or about August 22, 2017, NYLA CRIDER forwarded the Google Drive Link to JUSTIN SCHMITT and JASON SCHROCK and advised it was the link to all of the programs she brought to Valiant Charter Schools for the "summer program." NYLA CRIDER asked JUSTIN SCHMITT and JASON SCHROCK if they could verify the documents so she could begin to process Prodigy Athletes' invoices.

CHARGES (cont'd)

OVER ACT NO. (111): On or about August 22, 2017, NYLA CRIDER emailed KALEHUA KUKAHIKO and asked her to rewrite the Prodigy Athletes SWAG invoice for \$35,000 and use "Educational Services VALA" so she could issue a check the next day.

OVER ACT NO. (112): On or about August 22, 2017, NYLA CRIDER told KALEHUA KUKAHIKO Prodigy Athletes would need to create invoices for \$6,000 per month for the remainder of the money TROY KUKAHIKO was owed, plus any other students TROY KUKAHIKO could bring to Valiant Charter Schools before September 15, 2017.

OVER ACT NO. (113): On or about August 23, 2017, TROY KUKAHIKO texted NYLA CRIDER confirming SEAN MCMANUS was aware each program would receive \$200 from Valiant Charter Schools and \$200 from Prodigy Athletes (\$400 total) per participant.

OVER ACT NO. (114): On or about August 23, 2017, NYLA CRIDER confirmed over text with TROY KUKAHIKO each program would receive \$200 from Valiant Charter Schools and \$200 from Prodigy Athletes (\$400 total) per participant.

OVER ACT NO. (115): On or about August 23, 2017, TROY KUKAHIKO texted NYLA CRIDER the additional \$200 "Prodigy donation" was giving Valiant Charter Schools and Prodigy Athletes the competitive advantage in recruiting kids.

OVER ACT NO. (116): On or about August 23, 2017, TROY KUKAHIKO texted NYLA CRIDER he had a lot of "feet on the street" moving registrations that would bring Prodigy Athletes and Valiant Charter Schools a lot of money in the years to come.

OVER ACT NO. (117): On or about August 23, 2017, NYLA CRIDER texted TROY KUKAHIKO the only school with approved paperwork was San Juan Hills High School.

OVER ACT NO. (118): On or about August 24, 2017, Mosaica Online Academy of Los Angeles (the former corporate name of Valiant Academy of Los Angeles) issued Prodigy Athletes a check for \$36,000.

OVER ACT NO. (119): On or about August 28, 2017, RICHARD NGUYEN confirmed with NYLA CRIDER that Prodigy Athletes received the check for \$36,000.

OVER ACT NO. (120): On or about August 28, 2017, RICHARD NGUYEN texted NYLA CRIDER that Prodigy Athletes should submit an invoice every month for the remaining balance owed by Valiant Charter Schools.

OVER ACT NO. (121): On or about August 28, 2017, NYLA CRIDER emailed Aaron Flowers to schedule a time when she and JASON SCHROCK could personally deliver Valiant Charter School's payment to San Juan Hills High School.

OVER ACT NO. (122): On or about August 28, 2017, NYLA CRIDER texted TROY KUKAHIKO she was giving Prodigy Athletes' \$36,000 check to KALEHUA KUKAHIKO.

CHARGES (cont'd)

OVER ACT NO. (123): On or about August 29, 2017, Valiant Academy of Los Angeles issued Prodigy Athletes a check for \$36,000.

OVER ACT NO. (124): On or about August 30, 2017, TROY KUKAHIKO Prodigy Athletes issued an \$11,480 check to San Juan Hills High School ASB as payment for the San Juan Hills High School Prodigy Athletes SWAG participants.

OVER ACT NO. (125): On or about August 31, 2017, NYLA CRIDER asked JASON SCHROCK to bring a Memorandum of Understanding with him when they met with San Juan Hills High School football coach Aaron Flowers so Valiant Charter Schools could lock in San Juan Hills High School for the next 5 years.

OVER ACT NO. (126): On or about August 31, 2017, JASON SCHROCK texted NYLA CRIDER he would bring an MOU and asked Crider for the name of the program and what deal she gave them per student.

OVER ACT NO. (127): On or about August 31, 2017, NYLA CRIDER texted JASON SCHROCK the program name for the MOU was San Juan Hills High School and the deal she gave them was \$200 per student.

OVER ACT NO. (128): On or about August 31, 2017, NYLA CRIDER and JASON SCHROCK personally delivered a \$16,600 check from Valiant Charter Schools to San Juan Hills High School football coach Aaron Flowers.

OVER ACT NO. (129): On or about August 31, 2017 TROY KUKAHIKO obtained a \$4,340 cashier's check payable to Faatasi Le Atua, LLC, which was a corporation operated by Vincent Lobendahn, the football coach of John Glenn High School, as payment for the John Glenn High School Prodigy Athletes SWAG participants.

OVER ACT NO. (130): On or about August 31, 2017, TROY KUKAHIKO issued a \$1,360 check payable to Sam Tai.

OVER ACT NO. (131): On or about September 1, 2017, NYLA CRIDER gave Shannon Giese access to a shared Google Drive account with Prodigy Athletes and asked her to review the student registration documents Prodigy Athletes had collected for the Prodigy Athletes SWAG participants.

OVER ACT NO. (132): OVERT ACT NO. (148): On or about September 4, 2017, Shannon Giese texted NYLA CRIDER to ask if she should sign and date the Physical Education logs and Master Agreements for the Prodigy Athletes SWAG participants.

OVER ACT NO. (133): OVERT ACT NO. (149): On or about September 4, 2017, Shannon Giese texted NYLA CRIDER the end date on all of the Prodigy Athletes SWAG Master Agreements was August 31, 2017, and asked what she should do.

OVER ACT NO. (134): On or about September 4, 2017, NYLA CRIDER asked TROY KUKAHIKO to change the end dates on the Prodigy Athletes SWAG Master Agreements to reflect the day before the participant returned to their regular school and not the day when the student was not receiving services from Valiant Charter Schools.

CHARGES (cont'd)

OVER ACT NO. (135): On or about September 6, 2017, TROY KUKAHIKO issued a \$1,700 check payable to Sam Tai.

OVER ACT NO. (136): On or about September 10, 2017, TROY KUKAHIKO texted NYLA CRIDER he wouldn't have Carson High School's paperwork until September 15, 2017, despite the paperwork being dated 7/1/2017.

OVER ACT NO. (137): On or about September 10, 2017, NYLA CRIDER texted TROY KUKAHIKO he was approved to submit paperwork for Prodigy Athletes SWAG participants to Valiant Charter Schools by September 15 as long as the Master Agreements were dated July 1, 2017.

OVER ACT NO. (138): On or about September 13, 2017, Shannon Giese emailed NYLA CRIDER to advise the end date needed to be added to the Master Agreements Prodigy Athletes submitted for Infinity Cheerleading's SWAG participants.

OVER ACT NO. (139): On or about September 13, 2017, Shannon Giese emailed NYLA CRIDER to advise the paperwork Prodigy Athletes submitted for San Diego Fight Club's SWAG participants didn't include any Physical Education logs.

OVER ACT NO. (140): On or about September 13, 2017, NYLA CRIDER forwarded Shannon Giese's email about deficient Prodigy Athletes student registration files and paperwork to TROY KUKAHIKO.

OVER ACT NO. (141): On or about September 13, 2017, Shannon Giese sent a series of text messages to NYLA CRIDER containing photographs of what appeared to be edited student Master Agreements provided by Prodigy Athletes and asked if they were acceptable.

OVER ACT NO. (142): On or about September 13, 2017, NYLA CRIDER forwarded pictures of doctored Master agreements provided by Shannon Giese to SEAN MCMANUS for approval.

OVER ACT NO. (143): On or about September 14, 2017, Shannon Giese emailed NYLA CRIDER and TROY KUKAHIKO to express concern that Prodigy Athletes' SWAG Physical Education logs indicated elementary school children had performed an hour of weight lifting for at least 10 days each month (July, 2017 and August, 2017).

OVER ACT NO. (144): On or about September 14, 2017, Shannon Giese emailed TROY KUKAHIKO and NYLA CRIDER suggesting ten days of weight lifting for elementary school children, as described in the PE logs, appeared weird or unsafe for small children and asked TROY KUKAHIKO to change the PE logs.

OVER ACT NO. (145): On or about September 15, 2017, TROY KUKAHIKO emailed Shannon Giese, NYLA CRIDER, and SAM TAI to advise all student files were fixed and weight lifting was changed to plyometrics on all Physical Education logs for elementary school students.

OVER ACT NO. (146): On or about September 22, 2017, NYLA CRIDER emailed TROY KUKAHIKO and asked that he create an invoice for 28 Prodigy Athletes SWAG participants from the Mt. Helix Runnin Rebels football program.

CHARGES (cont'd)

OVER ACT NO. (147): On or about September 23, 2017, Shannon Giese sent a text message to NYLA CRIDER with a picture of a child's transcript dated August 23, 2017.

OVER ACT NO. (148): On or about September 23, 2017, Shannon Giese asked NYLA CRIDER if she was concerned a student transcript for a Prodigy Athletes SWAG participant was printed after the course had started.

OVER ACT NO. (149): On or about September 23, 2017, Shannon Giese emailed NYLA CRIDER and TROY KUKAHIKO to advise she completed her review of Prodigy Athletes SWAG student files and approved 16 students for Rancho Santa Margarita Pop Warner.

OVER ACT NO. (150): On or about September 28, 2017, RICHARD NGUYEN emailed SEAN MCMANUS and cc'd NYLA CRIDER to inquire if the Prodigy Athletes' invoices needed to say educational or instructional services.

OVER ACT NO. (151): On or about September 28, 2017, SEAN MCMANUS replied to RICHARD NGUYEN and said to ensure the Prodigy Athletes invoices stated they were for educational and instructional services.

OVER ACT NO. (152): On or about Sept 29, 2017, Valiant Academy of Southern California issued Prodigy Athletes a check for \$420.

OVER ACT NO. (153): On or about October 4, 2017, TROY KUKAHIKO sent an invoice to NYLA CRIDER for 32 Prodigy Athletes SWAG participants from San Diego Fight Club.

OVER ACT NO. (154): On or about October 4, 2017, NYLA CRIDER texted SEAN MCMANUS that Prodigy Athletes was going to sign up a few more softball teams that week.

OVER ACT NO. (155): On or about October 4, 2017, SEAN MCMANUS responded to NYLA CRIDER and asked if the softball teams Prodigy Athletes was still signing up were for the summer.

OVER ACT NO. (156): On or about October 4, 2017, NYLA CRIDER confirmed to SEAN MCMANUS that the softball teams Prodigy Athletes was still signing up were for the summer.

OVER ACT NO. (157): On or about October 4, 2017, SEAN MCMANUS responded to NYLA CRIDER "K."

OVER ACT NO. (158): On or about October 4, 2017, NYLA CRIDER texted SEAN MCMANUS to confirm "we can still accept it for this summer, right?"

OVER ACT NO. (159): On or about October 4, 2017, SEAN MCMANUS replied to NYLA CRIDER "yes" they would still accept kids for summer 2017.

OVER ACT NO. (160): On or about October 8, 2017, NYLA CRIDER emailed SEAN MCMANUS and RICHARD NGUYEN with copies of Prodigy Athletes' SWAG invoices for \$200 per student for Mt. Helix Runnin Rebels, Rancho Santa Margarita Pop Warner, Sapolu Youth Foundation, Power Surge, American Elite Sports, John Glenn High School, Infinity Cheerleading, SD Fight Club, and Be the One.

CHARGES (cont'd)

OVER ACT NO. (161): On or about October 8, 2017, NYLA CRIDER emailed SEAN MCMANUS and RICHARD NGUYEN advising Shannon Giese had gone through all of the Prodigy Athletes SWAG paperwork and signed off on all the work samples.

OVER ACT NO. (162): On or about October 8, 2017, NYLA CRIDER emailed SEAN MCMANUS and RICHARD NGUYEN with an invoice from Prodigy Athletes for \$105,000 for 210 new SWAG participants recruited between August 30, 2017, and October 8, 2017.

OVER ACT NO. (163): On or about October 16, 2017, TROY KUKAHIKO emailed Shannon Giese and NYLA CRIDER to advise 46 students from Carson High School had been added to the shared Google Drive folder for review.

OVER ACT NO. (164): On or about October 26, 2017, TROY KUKAHIKO texted NYLA CRIDER advising AIGA was one of the groups bringing a lot of students into the SWAG program.

OVER ACT NO. (165): On or about October 26, 2017, TROY KUKAHIKO asked if they could market Valiant Charter Schools as a sponsor or if Valiant Charter Schools could provide a gift to the players at AIGA's January 2018, Polynesian All American Bowl event.

OVER ACT NO. (166): On or about October 31, 2017, NYLA CRIDER texted SEAN MCMANUS to ask if TROY KUKAHIKO could bring another 300 summer school kids to Valiant Charter Schools.

OVER ACT NO. (167): On or about October 31, 2017, SEAN MCMANUS texted NYLA CRIDER keep them coming when asked if TROY KUKAHIKO could bring 300 more summer school kids.

OVER ACT NO. (168): On or about October 31, 2017, NYLA CRIDER texted SEAN MCMANUS she thought "JASON" SCHROCK said summer enrollment was closing.

OVER ACT NO. (169): On or about October 31, 2017, SEAN MCMANUS texted NYLA CRIDER "it's fine we'll take them" in response to bringing in more summer 2017, students.

OVER ACT NO. (170): On or about October 31, 2017, Shannon Giese received a paycheck from Valiant Charter Schools that was \$700 more than her base rate.

OVER ACT NO. (171): On or about October 31, 2017, NYLA CRIDER received a \$5,000 bonus from Valiant Charter Schools.

OVER ACT NO. (172): On or about November 1, 2017, Valiant Academy of Southern California issued a check to Prodigy Athletes for \$26,000.

OVER ACT NO. (173): On or about November 3, 2017, Valiant Academy of Southern California issued a check to Prodigy Athletes for \$75,200.

CHARGES (cont'd)

OVER ACT NO. (174): On or about November 4, 2017, Maureen Williams texted NYLA CRIDER, "I had the weirdest dreams last night! One was about us growing all Sean's schools. I was running all the Facebook campaigns and you were running around my office drinking champagne throwing money everywhere yelling I love bonuses."

OVER ACT NO. (175): On or about November 4, 2017, NYLA CRIDER sent forwarded the text from Maureen Williams text message about her dream to SEAN MCMANUS.

OVER ACT NO. (176): On or about November 4, 2017, SEAN MCMANUS responded to NYLA Crider saying "Wow sounds like a party I want to go to" in response the text message about Maureen William's dream.

OVER ACT NO. (177): On or about November 6, 2017, TROY KUKAHIKO issued a \$6,200 check payable to Faatasi Le Atua, LLC , which was a corporation operated by Vincent Lobendahn, the John Glenn High School football coach.

OVER ACT NO. (178): On or about November 8, 2017, NYLA CRIDER and SEAN MCMANUS texted each other about the payment structure for Valiant Charter School's 2018 summer session.

OVER ACT NO. (179): On or about November 8, 2017 SEAN MCMANUS told NYLA CRIDER he wanted to make 2018 summer session as cheap as possible but believed the cat was out of the bag with TROY KUKAHIKO at \$500 "per kid."

OVER ACT NO. (180): On or about November 8, 2017, NYLA CRIDER texted TROY KUKAHIKO advising she had confirmed with SEAN MCMANUS that Valiant Charter Schools would pay \$200 to the school and \$400 to Prodigy Athletes for each student Prodigy Athletes registered in Summer 2018.

OVER ACT NO. (181): On or about November 10, 2017, Valiant Academy of Southern California issued a check to Prodigy Athletes for \$5,000.

OVER ACT NO. (182): On or about November 10, 2017, TROY KUKAHIKO purchased a \$4,480 cashier's check payable to Mt. Helix Runnin Rebels as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (183): On or about November 10, 2017, TROY KUKAHIKO purchased a \$5,120 cashier's check payable to San Diego Fight Club as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (184): On or about November 10, 2017, TROY KUKAHIKO purchased a \$2,560 cashier's check payable to Savaii Seau who operated Be the One.

OVER ACT NO. (185): On or about November 10, 2017, TROY KUKAHIKO purchased a \$8,000 cashier's check payable to American Elite Sports as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (186): On or about November 10, 2017, TROY KUKAHIKO purchased a \$7,360 cashier's check payable to Power Surge as payment for their Prodigy Athletes SWAG participants.

CHARGES (cont'd)

OVER ACT NO. (187): On or about November 10, 2017, TROY KUKAHIKO purchased a \$24,080 cashier's check payable to Toalei Talataina as agent fees for recruiting organizations to Prodigy Athletes' SWAG.

OVER ACT NO. (188): On or about November 10, 2017, TROY KUKAHIKO purchased a \$4,000 cashier's check payable to Infinity Cheerleading as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (189): On or about November 12, 2017, Shannon Giese emailed TROY KUKAHIKO and NYLA CRIDER she was reviewing Prodigy Athletes SWAG student files for Carson High School.

OVER ACT NO. (190): On or about November 13, 2017, JUSTIN SCHMITT' texted NYLA CRIDER inquiring about the student count for summer.

OVER ACT NO. (191): On or about November 13, 2017, NYLA CRIDER texted JUSTIN SCHMITT they had 1,518 students, not including Prodigy Athletes because Shannon Giese was still reviewing their files for the prior summer.

OVER ACT NO. (192): On or about November 14, 2017, NYLA CRIDER emailed Shannon Giese to ask if there were any more student files from Prodigy Athletes that she had finished reviewing.

OVER ACT NO. (193): On or about November 15, 2017, Shannon Giese emailed NYLA CRIDER with a link to a Prodigy Athletes SWAG file that she finished reviewing.

OVER ACT NO. (194): On or about November 15, 2017, NYLA CRIDER emailed JUSTIN SCHMITT to confirm which email she was supposed to send the "summer docs" to.

OVER ACT NO. (195): On or about November 15, 2017, Shannon Giese received a paycheck from Valiant Charter Schools which was \$800 more than her base rate.

OVER ACT NO. (196): On or about November 15, 2017, NYLA CRIDER received a \$5,000 bonus from Valiant Charter Schools.

OVER ACT NO. (197): On or about November 16 2017, SEAN MCMANUS texted NYLA CRIDER directing her not to put Viva folks on anyone's roster except Shannon Giese's because others were getting paid to do nothing.

OVER ACT NO. (198): On or about November 20, 2017, NYLA CRIDER emailed the link with the recently reviewed Prodigy Athletes SWAG files to JUSTIN SCHMITT at enrollment@a3ed.org.

OVER ACT NO. (199): On or about November 26, 2017, JUSTIN SCHMITT' emailed NYLA CRIDER to ask where they stood on the rest of the Prodigy Athletes SWAG files.

OVER ACT NO. (200): On or about November 26, 2017, JUSTIN SCMITT' emailed NYLA CRIDER and said they needed to have the Prodigy Athletes SWAG files verified and added to a spreadsheet as soon as possible because Valiant Charter Schools' P1 report was due very soon.

CHARGES (cont'd)

OVER ACT NO. (201): On or about November 27, 2017, NYLA CRIDER emailed TROY KUKAHIKO to see if all of the Prodigy Athletes SWAG Master Agreements with problems had been redone.

OVER ACT NO. (202): On or about November 27, 2017, NYLA CRIDER emailed TROY KUKAHIKO to see if he was ready to have Shannon Giese review the Prodigy Athletes SWAG files.

OVER ACT NO. (203): On or about November 27, 2017, TROY KUKAHIKO told NYLA CRIDER there were 48 Prodigy Athletes SWAG Master Agreements that were redone.

OVER ACT NO. (204): On or about November 27, 2017, NYLA CRIDER emailed Shannon Giese to request she review the Prodigy Athletes SWAG files again.

OVER ACT NO. (205): On or about November 27, 2017, Shannon Giese emailed TROY KUKAHIKO and NYLA CRIDER to advise she was reviewing Prodigy Athletes' SWAG files and noticed Master Agreements had different colored ink.

OVER ACT NO. (206): On or about November 27, 2017, Shannon Giese emailed TROY KUKAHIKO and NYLA CRIDER to advise she was reviewing Prodigy Athletes' SWAG files and noticed Master Agreements were partially typed and partially handwritten.

OVER ACT NO. (207): On or about November 27, 2017, Shannon Giese emailed TROY KUKAHIKO and NYLA CRIDER to advise she was reviewing Prodigy Athletes' SWAG files and noticed student progress reports were collected instead of transcripts.

OVER ACT NO. (208): On or about November 27, 2017, Shannon Giese emailed TROY KUKAHIKO that all his Prodigy Athletes SWAG files needed to be fixed no later than November 29, 2017, or Valiant Charter Schools would not be able to pay Prodigy Athletes for those students.

OVER ACT NO. (209): On or about November 27, 2017, TROY KUKAHIKO emailed NYLA CRIDER notifying her he anticipated 300 "or so" new Prodigy Athletes SWAG student files to come in that week.

OVER ACT NO. (210): On or about November 27, 2017, TROY KUKAHIKO emailed NYLA CRIDER asking if the timeline had changed or could he submit 300 "or so" new Prodigy Athletes SWAG student files.

OVER ACT NO. (211): On or about November 27, 2017, NYLA CRIDER texted TROY KUKAHIKO advising the deadline to submit student files for Summer Session 2017, was November 29, 2017.

OVER ACT NO. (212): On or about November 29, 2017, NYLA CRIDER texted Amanda Keagan, Deana Zamiska, and Shannon Giese to advise she asked Shannon Giese to review the 700 (Prodigy Athletes SWAG) student files from summer and Shannon Giese would need an extension on her other projects since NYLA CRIDER was using Shannon Giese for the summer files.

CHARGES (cont'd)

OVER ACT NO. (213): On or about December 3, 2017, NYLA CRIDER texted Shannon Giese advising she was going to pay her \$500 extra during each of the next two pay periods for her work reviewing the 700 Prodigy Athletes SWAG files.

OVER ACT NO. (214): On or about December 6, 2017, Prodigy Athletes invoiced Valiant Charter Schools for 44 SWAG participants from Carson High School.

OVER ACT NO. (215): On or about December 7, 2017, Shannon Giese emailed NYLA CRIDER with an updated count of approved student files for Prodigy Athletes SWAG.

OVER ACT NO. (216): On or about December 8, 2017, TROY KUKAHIKO filed a Statement of Information with the California Secretary of State on behalf of Prodigy Athletes Foundation.

OVER ACT NO. (217): On or about December 8, 2017, TROY KUKAHIKO was identified as the CEO on the Prodigy Athletes Statement of Information filed with the California Secretary of State.

OVER ACT NO. (218): On or about December 8, 2017, KALEHUA KUKAHIKO was identified as the Secretary on the Prodigy Athletes Statement of Information filed with the California Secretary of State.

OVER ACT NO. (219): On or about December 11, 2017, Shannon Giese texted NYLA CRIDER advising she finished reviewing the Prodigy Athletes SWAG files.

OVER ACT NO. (220): On or about December 12, 2017, NYLA CRIDER emailed RICHARD NGUYEN to request payment for Prodigy Athletes.

OVER ACT NO. (221): On or about December 13, 2017, Valiant Academy of Southern California issued a check to Prodigy Athletes for \$12,000.

OVER ACT NO. (222): On or about December 15, 2017, Shannon Giese received a paycheck from Valiant Charter Schools which was \$500 more than her base rate.

OVER ACT NO. (223): On or about December 17, 2017, NYLA CRIDER forwarded Shannon Giese's revised numbers of approved Prodigy Athletes SWAG students per participating organization to TROY KUKAHIKO.

OVER ACT NO. (224): On or about December 17, 2017, TROY KUKAHIKO made a note in his phone documenting the differences between the Prodigy Athletes SWAG students Shannon Giese originally approved and the revised numbers.

OVER ACT NO. (225): On or about December 18, 2017, TROY KUKAHIKO emailed NYLA CRIDER invoices for the 3rd round of organizations recruited by Prodigy Athletes SWAG which included Carson High School, USA Softball, Gold Medal Marketing, Steele Canyon High School, San Diego Fight Club, SDFNL, & Be the One.

CHARGES (cont'd)

OVER ACT NO. (226): On or about December 18, 2017, TROY KUKAHIKO submitted a Prodigy Athletes SWAG invoice for \$90,500 to Valiant Charter Schools to cover the \$500 payment per student Valiant Charter Schools owed Prodigy Athletes for 181 new SWAG participants.

OVER ACT NO. (227): On or about December 18, 2017, NYLA CRIDER forwarded TROY KUKAHIKO's email with the Prodigy Athletes SWAG invoices for Prodigy Athletes' 3rd round of organizations to RICHARD NGUYEN.

OVER ACT NO. (228): On or about December 18, 2017, NYLA CRIDER emailed RICHARD NGUYEN stating the invoices provided by Prodigy Athletes were the rest of their invoices for the Prodigy Athletes SWAG summer program.

OVER ACT NO. (229): On or about December 18, 2017, NYLA CRIDER emailed RICHARD NGUYEN stating all of the Prodigy files had been reviewed by Shannon Giese and sent to JUSTIN SCHMITT for review.

OVER ACT NO. (230): On or about December 18, 2017, TROY KUKAHIKO obtained a \$6,000 cashier's check payable to Tom and NYLA CRIDER.

OVER ACT NO. (231): On or about December 26, 2017, Valiant Academy of Southern California issued Prodigy Athletes a check for \$9,800.

OVER ACT NO. (232): On or about December 29, 2017, Shannon Giese received a paycheck from Valiant Charter Schools which was \$500 more than her base rate.

OVER ACT NO. (233): On or about January 1, 2018, NYLA CRIDER received a \$2,500 bonus from Valiant Charter Schools.

OVER ACT NO. (234): On or about January 6, 2018, SEAN MCMANUS, NYLA CRIDER, TROY KUKAHIKO, and KALEHUA KUKAHIKO attended the AIGA Polynesian American Bowl at Carson High School.

OVER ACT NO. (235): On or about January 6, 2018, SEAN MCMANUS, NYLA CRIDER, & TROY KUKAHIKO posed for a photo with George Malau'ulu the President of AIGA.

OVER ACT NO. (236): On or about January 12, 2018, Shannon Giese received a paycheck from Valiant Charter Schools which was \$500 more than her base rate.

OVER ACT NO. (237): On or about January 22, 2018, Valiant Academy of Southern California issued Prodigy Athletes a check for \$105,600.

OVER ACT NO. (238): On or about January 23, 2018, Valiant Academy of Southern California issued Prodigy Athletes a check for \$12,000.

OVER ACT NO. (239): On or about January 26, 2018, TROY KUKAHIKO purchased a \$12,600 cashier's check payable to USA Softball as payment for their Prodigy Athletes SWAG participants.

CHARGES (cont'd)

OVER ACT NO. (240): On or about January 26, 2018, TROY KUKAHIKO purchased a \$6,233.76 cashier's check payable to American Elite Sports as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (241): On or about January 26, 2018, TROY KUKAHIKO purchased a \$1,400 cashier's check payable to Ruben Pena (SDFNL) as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (242): On or about January 26, 2018, TROY KUKAHIKO purchased a \$3,870 cashier's check payable to Sam Tai.

OVER ACT NO. (243): On or about January 26, 2018, TROY KUKAHIKO purchased a \$10,047 cashier's check payable to Toalei Talataina as agent fees for recruiting organizations to Prodigy Athletes' SWAG program.

OVER ACT NO. (244): On or about January 26, 2018 TROY KUKAHIKO purchased a \$980 cashier's check payable to Savaii Seau as payment for his Prodigy Athletes SWAG participants.

OVER ACT NO. (245): On or about January 26, 2018 TROY KUKAHIKO purchased a \$15,500 cashier's check payable to AIGA Foundation.

OVER ACT NO. (246): On or about January 30, 2018 NYLA CRIDER texted TROY KUKAHIKO asking that he obtain a W9 form from the San Juan Hills High School Booster Club because Valiant Charter Schools needed to send them a 1099 form.

OVER ACT NO. (247): On or about February 5, 2018 TROY KUKAHIKO emailed NYLA CRIDER (at her Excel academy email) suggesting they position Prodigy Athletes as "simply a vendor" for Valiant Charter Schools and, with exception of a few organizations, not bring up Valiant Charter Schools' donation to the organizations.

OVER ACT NO. (248): On or about February 15, 2018, NYLA CRIDER received a \$2,500 bonus from Valiant Charter Schools.

OVER ACT NO. (249): On or about February 16, 2018 TROY KUKAHIKO emailed NYLA CRIDER to discuss outstanding invoices and payments owed to Prodigy Athletes.

OVER ACT NO. (250): On or about February 20, 2018 TROY KUKAHIKO emailed NYLA CRIDER with Prodigy Athletes SWAG invoices totaling \$93,000.

OVER ACT NO. (251): In or around and between December 23, 2017, JUSTIN SCHMITT submitted ADA for P1 for Valiant Academy Southern California , which included students brought in by Prodigy Athletes.

OVER ACT NO. (252): On or about February 23, 2018 NYLA CRIDER texted Deanna Zamiska they would need a lot of teachers and anticipated Prodigy Athletes would bring 1,000 students to Valiant Charter Schools for summer 2018.

CHARGES (cont'd)

OVER ACT NO. (253): On or about February 23, 2018, Deanna Zamiska texted NYLA CRIDER and asked if Prodigy Athletes needed "actual" teachers and said she thought they just collected the Physical Education log.

OVER ACT NO. (254): On or about February 23, 2018, NYLA CRIDER texted Deanna Zamiska she was working on it and may need a few teachers for Prodigy Athletes for 2018.

OVER ACT NO. (255): On or about February 28, 2018, NYLA CRIDER received a \$2,500 bonus from Valiant Charter Schools.

OVER ACT NO. (256): On or about March 9, 2018, KALEHUA KUKAHIKO texted NYLA CRIDER a copy of a proposed flyer for Prodigy Athletes for an SAT/ACT prep course for summer 2018.

OVER ACT NO. (257): On or about March 9, 2018, NYLA CRIDER texted KALEHUA KUKAHIKO she was reviewing the proposed flyer for Prodigy Athletes' SAT/ACT prep course for summer 2018.

OVER ACT NO. (258): On or about March 9, 2018, KALEHUA KUKAHIKO texted NYLA CRIDER asking for NYLA to review the proposed flyer for Prodigy Athletes' SAT/ACT prep course for summer 2018.

OVER ACT NO. (259): On or about March 9, 2018, NYLA CRIDER texted SEAN MCMANUS and JUSTIN SCHMITT a copy of Prodigy Athletes' SAT/ACT prep course flyer for summer 2018.

OVER ACT NO. (260): On or about March 9, 2018, NYLA CRIDER texted SEAN MCMANUS and JUSTIN SCHMITT asking if the wording on Prodigy Athletes' SAT/ACT prep course flyer for summer 2018 was ok because it stated Prodigy Athletes would pay participating programs \$100 per registrant.

OVER ACT NO. (261): On or about March 9, 2018, SEAN MCMANUS texted NYLA CRIDER he would review the Prodigy Athletes' SAT/ACT prep course flyer for summer 2018 and call her soon.

OVER ACT NO. (262): On or about March 10, 2018, TROY KUKAHUKO texted NYLA CRIDER with a copy of Prodigy Athletes' SAT/ACT prep course flyer for summer 2018.

OVER ACT NO. (263): On or about March 12, 2018, TROY KUKAHIKO emailed RICHARD NGUYEN and provided copies of outstanding invoices from Prodigy Athletes and a payment summary document.

OVER ACT NO. (264): On or about March 15, 2018, NYLA CRIDER received a \$2,500 bonus from Valiant Charter School.

OVER ACT NO. (265): On or about March 20, 2018, Valiant Academy of Southern California issued Prodigy Athletes a check for \$93,000.

OVER ACT NO. (266): On or about March 20, 2018, NYLA CRIDER again inquired about Prodigy Athletes' SAT/ACT prep course flyer for summer 2018 with SEAN MCMANUS and JUSTIN SCHMITT via text.

CHARGES (cont'd)

OVER ACT NO. (267): On or about March 20, 2018, JUSTIN SCHMITT texted NYLA CRIDER and SEAN MCMANUS suggesting the Prodigy Athletes' SAT/ACT prep course flyer for summer 2018 reference California Academy of Sports Science (CASS) if it was being offered in the counties CASS served because it would be a better brand for the program.

OVER ACT NO. (268): On or about March 21, 2018, , and after a search warrant was executed at the home of TROY KUKAHIKO and KALEHUA KUKAHIKO NYLA CRIDER texted Robin Foyle and requested she remove KALEHUA KUKAHIKO's name from Prodigy Athletes on the Valiant Prep vendor information page.

OVER ACT NO. (269): On or about March 21, 2018, NYLA CRIDER texted SEAN MCMANUS advising she spoke to KALEHUA KUKAHIKO regarding the search warrant executed at her house.

OVER ACT NO. (270): On or about March 21, 2018, NYLA CRIDER texted SEAN MCMANUS that KALEHUA KUKAHIKO was asked about Average Daily Attendance during the search warrant.

OVER ACT NO. (271): On or about March 22, 2018, NYLA CRIDER advised Robin Foyle the contact name for Prodigy Athletes on Valiant Charter Schools' vendor page should read TROY LAU, which is an AKA for TROY [KUKAHIKO], with a contact email of prodigyathletes@gmail.com.

OVER ACT NO. (272): On or about March 22, 2018, NYLA CRIDER texted Robin Foyle that she needed to make the change to Prodigy Athlete's contact information on the Valiant Charter Schools' vendor information page that day.

OVER ACT NO. (273): On or about March 27, 2018, NYLA CRIDER texted SEAN MCMANUS she was taking care of Master Agreements from last summer.

OVER ACT NO. (274): On or about April 10-11, 2018, NYLA CRIDER asked her subordinate Shannon Giese to sign student master agreements as the supervising teacher for Prodigy Athletes' SWAG students for summer 2017.

OVER ACT NO. (275): On or about April 10-11, 2018, NYLA CRIDER asked her subordinate, Valiant Charter Schools Education Coach Andrea Franco to signed 563 Master Agreements as the supervising teacher for Prodigy Athletes' SWAG students for summer 2017.

OVER ACT NO. (276): On or about April 10-11, 2018, Andrea Franco signed 563 Master Agreements as the supervising teacher for Prodigy Athletes' SWAG students for summer 2017 at the direction of her boss, NYLA CRIDER.

OVER ACT NO. (277): On or about April 10-11, 2018, Andrea Franco texted NYLA CRIDER she spent between 35 and 55 seconds per Master Agreement she signed for Prodigy Athletes' SWAG students.

OVER ACT NO. (278): On or about April 10-11, 2018, NYLA CRIDER did not inform Andrea Franco that search warrants had been executed at the home of KALEHUA KUKAHIKO and TROY KUKAHIKO.

CHARGES (cont'd)

OVER ACT NO. (279): On or about April 14, 2018, NYLA CRIDER asked TROY KUKAHIKO if he was able to obtain additional information from the coaches for last summer so Valiant Charter Schools could prove SWAG happened during the summer.

OVER ACT NO. (280): Between July 1 2017 and August 31, 2017 credentialed teachers employed by Valiant Charter School and teachers and Prodigy Athletes teachers had no contact with students from sports programs recruited and enrolled by TROY KUKAHIKO and Prodigy Athletes.

COUNT 2 - CONSPIRACY TO COMMIT A CRIME

On or about and between January 1, 2016 and February 11, 2019, SEAN JOSEPH MCMANUS, JUSTIN KENT SCHMITT, JASON ALAN SCHROCK, ELI RALPH JOHNSON, RICHARD BA NGUYEN, NYLA JUNE CRIDER, STEVEN BRAIN ZANT, and ROBERT JOHN WILLIAMS did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Theft of Public Funds, Penal Codes Section 424 Misrepresenting charter school services to obtain additional public funds, in violation of PENAL CODE SECTION 182(a)(1).

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

The object of the conspiracy was to collect public funds from the state for charter school enrollments they were not lawfully entitled to collect. These include a variety of measures:

- Conspirators knowingly collected public funds for large amounts of students for “summer school” through a multitrack attendance calendar, claiming Track A, started on July 1 and ended 175 days later, but in reality Conspirators openly advertised and intentionally enrolled students in school for 40 days only, and claimed to the State that students all voluntarily withdrew before 175 days. To increase profit from Track A enrollments, Conspirators did not assign teachers to Track A at lawful pupil to teacher ratios.
- Conspirators also enrolled children for Track A from pre-existing youth programs such as sports teams, camps, gyms, private schools both religious and secular, and private enrichment centers. Conspirators paid pre-existing youth programs for student report cards and enrollment documentation and used the documentation as the basis to enroll students in public charter schools. Conspirators provided limited to no services to the pre-existing programs and did not assign teachers at lawful pupil to teacher ratios. Conspirators paid the pre-existing youth programs a fraction of what was received in public funds from the state for 40 days of enrollment.
- Conspirators also operated an online and homeschool program that operated both during the regular school year and over summer. Conspirators knowingly obtained additional ADA funding for full year students over summer, by un-enrolling them in their charter school, and enrolling them in a separate “sister” charter school without the student’s or parent’s knowledge.

CHARGES (cont'd)

- Conspirators knowingly manipulated invoices to come into compliance with the 80% / 40% spending requirements, required for 100% funding they received through the charter schools' non-classroom based funding determination approved by the State Board of Education. Conspirators also knowingly manipulated how teachers were assigned across charter schools to feign compliance with the pupil to teacher ratio for funding determinations.
- Conspirators evaded oversight by knowingly manipulating financial and programmatic information given to auditors. Conspirators also changed auditors when questioned about operations.
- Conspirators evaded oversight by courting and seeking charter school authorization from small school districts across California who were suffering declining enrollment and budget woes. Conspirators provided their authorizers significant additional state funding and services in the form of oversight fees. Conspirators knowingly approached these small districts because they were not in a financial position to challenge Conspirators enrollment practices through oversight and could not afford the revocation process.
- Conspirators evaded oversight by identifying subordinate administrators as the CEO of the charter schools on public documents and as the contact person to state agencies to hide the leadership of the charter schools.

OVERT ACT NO. (1): On or about and between July 1, 2017 and June 30, 2018, SEAN MCMANUS and JASON SCHROCK, through charter schools they controlled, collected \$7,083 per ADA for a student in grade span K-3, collected \$7,189 per ADA for a student in grade span 4-6, collected \$7,403 per ADA for a student in grade span 7-8, collected \$8,578 per ADA for a student in grade span 9-12.

OVERT ACT NO. (2): On or about and between July 1, 2017 and June 30, 2018, SEAN MCMANUS and JASON SCHROCK, through charter schools they controlled, collected proportional ADA for summer school at or around \$40 per day.

OVERT ACT NO. (3): On or about and between July 1, 2018 and May 2019, SEAN MCMANUS and JASON SCHROCK, through charter schools they controlled, requested public funds at the following rates \$8,235 per ADA for a student in grade span K-3, collected \$7,571 per ADA for a student in grade span 4-6, collected \$7,796 per ADA for a student in grade span 7-8, collected \$9,269 per ADA for a student in grade span 9-12.

OVERT ACT NO. (4): On or about and between July 1, 2018 and February 2019, SEAN MCMANUS and JASON SCHROCK, through charter schools they controlled, collected proportional ADA for summer school at or around \$40 per day.

OVERT ACT NO. (5): On or about and between January 2017 and June 2018, SEAN MCMANUS was primarily concerned with increasing enrollment numbers for the charter schools.

OVERT ACT NO. (6): On or about April 24, 2017, SEAN MCMANUS and JASON SCHROCK hired NYLA CRIDER to expand enrollment in Valiant Charter Schools.

OVERT ACT NO. (7): On or about April 24, 2017, SEAN MCMANUS directed NYLA CRIDER via text to get going on summer school.

CHARGES (cont'd)

OVERT ACT NO. (8): On or about May 8, 2017, JASON SCHROCK and SEAN MCMANUS explained to NYLA CRIDER via text that a master agreement, birth certificate and proof of address was all that was needed to enroll kids in the summer program for Valiant Charter Schools.

OVERT ACT NO. (9): On or about June 8, 2017, SEAN MCMANUS texted NYLA CRIDER to recruit California Virtual Academy teachers and their friends with student rosters to come to Valiant to increase their enrollment numbers.

OVERT ACT NO. (10): On or about July 2, 2017, NYLA CRIDER reported to SEAN MCMANUS Valiant had 978 students.

OVERT ACT NO. (11): On or about July 2, 2017, SEAN MCMANUS texted NYLA CRIDER in response to 978 students and said “the ladies are just killing it” and “Let’s keep rocking.”

OVERT ACT NO. (12): On or about July 7, 2017, SEAN MCMANUS texted NYLA CRIDER to inquire about Valiant Charter Schools’ enrollment numbers.

OVERT ACT NO. (13): On or about July 7, 2017, NYLA Crider responded to SEAN MCMANUS via text and reported enrollment was 1,039.

OVERT ACT NO. (14): On or about July 12, 2017, SEAN MCMANUS gave NYLA CRIDER an immediate \$25,000 raise and set enrollment benchmarks for bonuses up to an additional \$30,000.

OVERT ACT NO. (15): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER asking about Valiant’s enrollment numbers.

OVERT ACT NO. (16): On or about July 13, 2017, NYLA CRIDER reported to SEAN MCMANUS via text that Valiant’s enrollment was 1,224 but would increase once the high school athletes came in.

OVERT ACT NO. (17): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER “go hard” for the next six weeks and make sure all documents were backdated to July 1, 2017.

OVERT ACT NO. (18): On or about July 13, 2017, NYLA CRIDER texted SEAN MCMANUS “I will” in response to SEAN MCMANUS’s direction to “go hard” and to ensure the documents were backdated to July 1, 2017.

OVERT ACT NO. (19): On or about November 8, 2017 SEAN MCMANUS told NYLA CRIDER he wanted to make 2018 summer session as cheap as possible.

OVERT ACT NO. (20): On or about November 13, 2017, JUSTIN SCHMITT texted NYLA CRIDER inquiring about the student count for summer.

CHARGES (cont'd)

OVERT ACT NO. (21): On or about November 13, 2017, NYLA CRIDER texted JUSTIN SCHMITT they had 1,518 students, not including Prodigy Athletes because Shannon Giese was still reviewing their files for the prior summer.

OVERT ACT NO. (22): On or about November 15, 2017, NYLA CRIDER received a \$5,000 bonus from Valiant Charter Schools.

HAVING LESS THAN 175 DAYS IN A TRACK

OVERT ACT NO. (23): On or about and between July 1, 2017 and August 31, 2017, SEAN MCMANUS, JASON SCHROCK, JUSTIN SCHMITT, and NYLA CRIDER advertised to the public that A3 controlled charter schools offered a summer school only program less than 175 days.

OVERT ACT NO. (24): On or about and between July 1, 2018 and August 31, 2018 SEAN MCMANUS and JASON SCHROCK advertised to the public that A3 controlled charter schools offered a summer school only program less than 175 days.

OVERT ACT NO. (25): On or about and between January 1, 2015 and May 2019, ELI JOHNSON and JUSTIN SCHMITT proposed to small school districts that as a benefit for authorizing charter schools, the charter schools would provide free summer school by enrolling district students into the charter schools for less than 175 days.

OVERT ACT NO. (26): On or about and between January 1, 2017 and May 2019, SEAN MCMANUS, and JASON SCHROCK directed Luiz Rigney to collect enrollment paperwork to enroll students from traditional public school football teams during the summer with intent for them to enroll in a charter school for less than 175 days.

OVERT ACT NO. (27): On or about and between January 1, 2017 and May 2019, SEAN MCMANUS, and JASON SCHROCK directed Scott Rungworth to collect enrollment paperwork to enroll students from traditional public school football teams during the summer with intent for them to enroll in a charter school for less than 175 days.

OVERT ACT NO. (28): On or about and between January 1, 2017 and May 2019, SEAN MCMANUS, and JASON SCHROCK directed Earl Franklin to collect enrollment paperwork to enroll students from traditional public school football teams during the summer with intent for them to enroll in a charter school for less than 175 days.

OVERT ACT NO. (29): On or about and between January 1, 2017 and May 2019, SEAN MCMANUS, and JASON SCHROCK directed Mark Cupp Jr. to collect enrollment paperwork to enroll students from traditional public school athletic programs during the summer with intent for them to enroll in a charter school for less than 175 days.

OVERT ACT NO. (30): On or about and between January 1, 2017 and May 2019, SEAN MCMANUS, and JASON SCHROCK directed NYLA CRIDER to collect enrollment paperwork to enroll students from traditional public school football teams and other youth sports programs during the summer with intent for them to enroll in a charter school for less than 175 days.

ENROLLING STUDENTS IN PRE-EXISTING SPORTS PROGRAMS

CHARGES (cont'd)

OVERT ACT NO. (31): On or about July 12, 2017, SEAN MCMANUS approved via text, that NYLA CRIDER provide full funding to high school athletes that enrolled by August 1, 2017, as long as their registration documents were all backdated to July 1, 2017.

OVERT ACT NO. (32): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER to recruit as many high school teams as she could.

OVERT ACT NO. (33): In or around and between July, 2017 and November 2017, Luiz Rigney, at the direction of SEAN MCMANUS collected student master agreements, proof of age, and proof of residence for approximately 4,000 students participating in existing youth athletic programs.

OVERT ACT NO. (34): In or around and between July, 2017 and November 2017, SEAN MCMANUS offered Luiz Rigney \$25 per student he was able to enroll into summer school.

OVERT ACT NO. (35): In or around and between July, 2017 and November 2017, SEAN MCMANUS directed Luiz Rigney to provide youth sports programs \$25 per student that enrolled in the charter school.

OVERT ACT NO. (36): On or about and between July 1, 2017 and February 11, 2019 SEAN MCMANUS and JASON SCHROCK collected public funds through charter schools under their control from participants in existing summer youth sports programs brought in by Luiz Rigney without the charter school having any direct contact with the students over the summer.

OVERT ACT NO. (37): In or around and between July 1 2017, and June 30, 2018 SEAN MCMANUS and JASON SCHROCK, through charter schools under their control, enrolled students in charter schools earning around 40 days of attendance at approximately \$2000 per student.

OVERT ACT NO. (38): On or about July 2, 2017, JASON SCHROCK emailed Luiz Rigney "Summer School team, I know its crazy busy for you all, but I need updates please about each of your data collections to date, process, and projected student enrollments for Summer."

OVERT ACT NO. (39): On or about July 3, 2017, Luiz Rigney emailed JASON SCHROCK "All of mine are sending in their MA's and registration forms along with their activity logs in late August. I wanted to streamline it as much as possible having them send in paperwork once. This way they have more time to collect MA's which is the most difficult part."

OVERT ACT NO. (40): On or about July 3, 2017, JASON SCHROCK asked Luiz Rigney "Any guess on your numbers Lou? Need it for planning if possible."

OVERT ACT NO. (41): On or about July 3, 2017, Luiz Rigney responded to JASON SCHROCK "I'm guessing 7000 on the low end and 10000 on the high end."

CHARGES (cont'd)

OVERT ACT NO. (42): On or about July 7, 2017, SEAN MCMANUS emailed Luiz Rigney "Guys can I get an update in what we are doing in these regions please? Need to supercharge enrollment for the summer in these areas please advise thanks sean"

OVERT ACT NO. (43): On or about July 7, 2017, Luiz Rigney emailed SEAN MCMANUS and JASON SCHROCK "I have 10-15 football teams (each team averages 160 kids) from San Luis Obispo and Santa Barbara counties taking part. I have another 10 teams from Monterey county, 10 teams from Fresno county, and 15-20 from Merced and bordering counties.

OVERT ACT NO. (44): On or about July 8, 2017, SEAN MCMANUS texted Luiz Rigney "How are your numbers looking?"

OVERT ACT NO. (45): On or about July 8, 2017, Luiz Rigney responded to SEAN MCMANUS "They're great. I have about 11,000 kids that will be doing it. We'll see how many master agreements we get back but everyone is taking their time to get it done. Should have over 15,000 by the end of the week."

OVERT ACT NO. (46): On or about July 8, 2017, SEAN MCMANUS responded to Luiz Rigney "Keep rolling you never know where it will end up. Push."

OVERT ACT NO. (47): On or about July 8, 2017, Luiz Rigney texted SEAN MCMANUS "I've got this one football league that I am presenting too on Monday that has 16 teams but one of them is in San Joaquin County. The Board might say that they are not willing to work with us because we can't help the San Joaquin Team. Any thoughts? I just don't want to pass up the other 2000-2500 kids."

OVERT ACT NO. (48): On or about July 8, 2017, SEAN MCMANUS responded to Luiz Rigney "Sign them up" knowing that A3 controlled charter schools were not authorized in San Joaquin County or any county contiguous to San Joaquin County.

OVERT ACT NO. (49): On or about July 9, 2017, SEAN MCMANUS agreed to pay Luiz Rigney \$25 per students as well as \$25 per student for other recruiters Luiz Rigney brought on to find students to enroll.

OVERT ACT NO. (50): In or around August 2017, SEAN MCMANUS told Luiz Rigney if he enrolls 10,000 students he would buy him a trip to Tahiti.

OVERT ACT NO. (51): On or about September 16, 2017, Luiz Rigney texted SEAN MCMANUS "I've got a team here that didn't enter what grade their child is in, on any master agreements. Should I send them back and have them enter them in."

OVERT ACT NO. (52): On or about September 17, 2017, SEAN MCMANUS responded to Luiz Rigney "Estimate."

OVERT ACT NO. (53): On or about September 17, 2017, Luiz Rigney texted SEAN MCMANUS "I did."

CHARGES (cont'd)

OVERT ACT NO. (54): On or about September 17, 2017, SEAN MCMANUS texted Luiz Rigney "K then we are good."

OVERT ACT NO. (55): On or about November 14, 2017, JUSTIN SCHMITT emailed Luiz Rigney a spreadsheet indicating the total number of student master agreements he collected for Summer and the total number of enrollments verified.

OVERT ACT NO. (56): On or about November 14, 2017, the spreadsheet provided by JUSTIN SCHMITT to Luiz Rigney indicated Luiz Rigney collected 4,213 Master Agreements from various pre-existing youth programs primarily including high school football teams.

OVERT ACT NO. (57): On or about November 14, 2017, the spreadsheet provided by JUSTIN SCHMITT to Luiz Rigney indicated of the 4,213 master agreements he provided, 3,537 could be paid out at \$25 per student.

OVERT ACT NO. (58): On or about November 20, 2017, SEAN MCMANUS texted Luiz Rigney "So what's your total?"

OVERT ACT NO. (59): On or about November 20, 2017, Luiz Rigney responded to SEAN MCMANUS "About 5,200"

OVERT ACT NO. (60): On or about November 20, 2017, SEAN MCMANUS "That's a great first effort."

OVERT ACT NO. (61): In or around and between July 2017 and November 2017, the master agreements that Luiz Rigney collected from students were dated at the time of signature.

OVERT ACT NO. (62): On or about December 4, 2017, SEAN MCMANUS texted Luiz Rigney "Some of your kids have incorrect dates on master agreements I can't claim any attendance for these kids if we don't get a revised master agreement."

OVERT ACT NO. (63): On or about December 4, 2017, Luiz Rigney responded by text to SEAN MCMANUS "Organizations have this problem. I am being sent proper ma's."

OVERT ACT NO. (64): On or about December 4, 2017, SEAN MCMANUS responded by text to Luiz Rigney "Ok Good to hear."

OVERT ACT NO. (65): On or about December 5, 2017, Luiz Rigney texted SEAN MCMANUS "Can you confirm what the date needs to be on summer school mas? The first day of summer school, before it started, or any day within the range of dates that they participated."

OVERT ACT NO. (66): On or about December 5, 2017, SEAN MCMANUS texted Luiz Rigney and replied "7-1."

OVERT ACT NO. (67): On or about December 5, 2017, Luiz Rigney texted SEAN MCMANUS and asked "Their signature date needs to be 7-1?"

CHARGES (cont'd)

OVERT ACT NO. (68): On or about December 5, 2017, SEAN MCMANUS responded to Luiz Rigney "No it needs to be dated 7-1."

OVERT ACT NO. (69): On or about December 9, 2017, SEAN MCMANUS texted Luiz Rigney "I need to speak with urgently here is a huge problem with many of your master agreements. Please call me."

OVERT ACT NO. (70): On or about December 10, 2017, Luiz Rigney texted SEAN MCMANUS "Does it matter what date is written for the teacher signature? Justin [JUSTIN SCHMITT] was unsure."

OVERT ACT NO. (71): In or around December, 2017, SEAN MCMANUS directed Luiz Rigney to backdate around 4,000 master agreements he had collected to ensure the dates reflected student enrollment beginning on July 1, 2017 with knowledge that the agreements were signed by parents after July 1, 2017.

OVERT ACT NO. (72): In or around December, 2017, Luiz Rigney understood from SEAN MCMANUS that each student over summer generated around \$2000 and his boss, SEAN MCMANUS, would lose out on around \$8,000,000 if Luiz Rigney did not backdate the agreements.

OVERT ACT NO. (73): In or around December, 2017, Luiz Rigney understood that by backdating agreements he was misrepresenting the dates the students claimed to have participated in the charter school to generate additional public funds for SEAN MCMANUS.

OVERT ACT NO. (74): In or around December, 2017, Luiz Rigney backdated around 4,000 master agreements to July 1, 2017 at the direction of SEAN MCMANUS.

OVERT ACT NO. (75): In or around December, 2017, Luiz Rigney delivered the 4,000 backdated master agreements in suitcases to the A3 records collections office at 4684 Ontario Mills Pkwy, Ontario, CA 91764.

OVERT ACT NO. (76): In or around and between July 2017 and December 2017, youth football teams "enrolled" in A3 controlled charter schools by Luiz Rigney had no contact with charter school employees.

OVERT ACT NO. (77): In or around and between July 2017 and December 2017, youth football teams "enrolled" in A3 controlled charter schools by Luiz Rigney received no additional educational services than they would have otherwise received from their pre-existing programs.

OVERT ACT NO. (78): On or about June 1, 2018, Valiant Academy Los Angeles issued Luiz Rigney a check for \$93,725 as payment for bringing in students from youth football programs.

OVERT ACT NO. (79): On or about and between July 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK collected public funds through charter schools under their control from participants in existing summer youth sports programs brought in by Earl Franklin without the charter school having any direct contact the students.

CHARGES (cont'd)

OVERT ACT NO. (80): On or about and between June 2017 and December 2017, JASON SCHROCK informed Earl Franklin of the opportunity to earn money for recruiting students participating in existing sports programs to be enrolled in the charter schools.

OVERT ACT NO. (81): On or about and between July 1, 2017 and February 11, 2019, JASON SCHROCK offered Earl Franklin about \$50 per student that he recruited to the charter schools.

OVERT ACT NO. (82): On or about and between July 1, 2017 and February 11, 2019, Earl Franklin at the direction of JASON SCHROCK provided sports programs \$180 per student for student master agreements, proof of age, and proof of residence.

OVERT ACT NO. (83): On or about and between July 1, 2017 and February 11, 2019, Earl Franklin, directly, and through subordinates, collected thousands of master agreements to be enrolled in charter schools controlled by SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (84): In or around and between July 1 2017, and June 30, 2018, SEAN MCMANUS and JASON SCHROCK, through charter schools under their control, enrolled students using paperwork provided by Earl Franklin in charter schools earning around 40 days of attendance at approximately \$2000 per student.

OVERT ACT NO. (85): In or around January 2018, SEAN MCMANUS, JASON SCHROCK, NYLA CRIDER, Luiz Rigney, Mark Cupp Jr., and Earl Franklin, attended a breakout session at the annual A3 Education conference to discuss summer enrollment of existing athletic programs.

OVERT ACT NO. (86): In or around January 2018, Mark Cupp Jr. expressed concerns to JASON SCHROCK about "Non Teachers Leading" summer school programs.

OVERT ACT NO. (87): In or around January 2018, Mark Cupp Jr. expressed concerns to JASON SCHROCK about "Unknown Teachers" to the charter school signing student master agreements.

OVERT ACT NO. (88): In or around January 2018, Mark Cupp Jr. suggested to JASON SCHROCK that the summer program provide curriculum to participants in existing programs to use as work samples rather than PE logs of services not provided by the charter school.

ENROLLING STUDENTS FROM PRIVATE SCHOOLS AND PRIVATE LEARNING CENTERS

OVERT ACT NO. (89): On or about July 13, 2017, NYLA CRIDER texted SEAN MCMANUS and asked if they could keep the private school athletes enrolled in Valiant Charter Schools during the summer and traditional school year even though they were enrolled in private schools during the school year.

OVERT ACT NO. (90): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER "yes" in response to her question about keeping private school athletes in Valiant Charter Schools during the summer and school year.

CHARGES (cont'd)

OVERT ACT NO. (91): On or about August 4, 2017, NYLA CRIDER and SEAN MCMANUS discussed paying referral fees to parents who referred students to Valiant Charter Schools.

OVERT ACT NO. (92): On or about July 13, 2017, NYLA CRIDER texted SEAN MCMANUS that she needed to discuss 200 summer students she was bringing to Valiant Charter Schools from a private school who wanted to stay with Valiant Charter Schools during the fall and NYLA CRIDER wanted to know how to deal with the “\$\$\$\$.”

OVERT ACT NO. (93): On or about October 29, 2017, SEAN MCMANUS texted NYLA CRIDER he was thinking of doing summer school programs for the church next year.

OVERT ACT NO. (94): On or about October 29, 2017, NYLA CRIDER texted SEAN MCMANUS she had huge connections with tons of kids at church and was disappointed she hadn't thought about that for summer 2017.

FUNDAMENTAL FOUNDATIONS

OVERT ACT NO. (95): On or about and between July 1, 2017 and September 12, 2017, A3 Controlled Charter Schools enrolled students from Fundamental Foundations, a privately operated learning center with its own teaching staff.

OVERT ACT NO. (96): On or about September 12, 2017, SEAN MCMANUS texted NYLA CRIDER “Those fundamental foundation folks start 7-1 RIGHT.”

OVERT ACT NO. (97): On or about September 12, 2017, NYLA CRIDER responded “yes” to SEAN MCMANUS asking about the start date for Fundamental Foundations.

DISCOVERY OF LEARNING

OVERT ACT NO. (98): On or about and between July 2017, and February 2019, SEAN MCMANUS and JASON SCHROCK, through charter schools under their control, paid Discovery of Learning \$6000 per school year per student to provide students a full continuum of educational services.

OVERT ACT NO. (99): On or about and between July 2017 and February 2019, SEAN MCMANUS and JASON SCHROCK, enrolled Discovery of Learning students into charter schools under their control and collected between \$7,083 through \$9,269 per student per year in public funds depending on the age of the student.

OVERT ACT NO. (100): On or about and between July 2017 and February 2019, NYLA CRIDER assigned Ryan Valentine to be the teacher of record for Discovery of Learning for more than 25 students.

OVERT ACT NO. (101): On or about and between July 2017 and February 2019, NYLA CRIDER directed Ryan Valentine to collect paperwork from Discovery of Learning and not meet with students or families of students enrolled in Discovery of Learning.

WEST COAST COMMUNITY SERVICES

CHARGES (cont'd)

OVERT ACT NO. (102): On or about May 17, 2017, JASON SCHROCK and Sima Engelstein negotiated a contract between Valiant Charter School and West Coast Community Services, Inc.

OVERT ACT NO. (103): On or about May 17, 2017, Sima Engelstein on behalf of West Coast Community Services, agreed to provide the full continuum of educational services for students either directly or through a community partner selected by West Coast Community Services which included private schools.

OVERT ACT NO. (104): On or about May 17, 2017, JASON SCHROCK agreed on behalf of Valiant Charter Schools to pay West Coast Community Services \$5000 per year per student who enrolled in Valiant Charter School.

OVERT ACT NO. (105): On or about and between May 17, 2017 and February 11, 2019, Sima Engelstein collected \$500 per student per month from Valiant Los Angeles and CA STEAM SAN BERNARDINO and either provided the family directly with \$300 per student per month or provided a private school directly with \$300 per student per month.

OVERT ACT NO. (106): On or about and between July 2017 and February 2019, SEAN MCMANUS and JASON SCHROCK, through charter schools they control, enrolled students referred by Sima Engelstein of West Coast Community Services and collected between \$7,083 through \$9,269 per student per year in public funds depending on the age of the student.

OVERT ACT NO. (107): On or about June 27, 2017, JUSTIN SCHMITT emailed Sima Engelstein and referred to her as a Partner Program that must coordinate a time to deliver student files to the office.

OVERT ACT NO. (108): On or about and between July 2017 and February 2019, Sima Engelstein collected work samples for West Coast Community Services students and provided them to JASON SCHROCK and JUSTIN SCHMITT.

OVERT ACT NO. (109): On or about and between July 2017 and February 2019, A3 controlled charter school teachers had no direct contact with students brought in by Sima Engelstein and West Coast Community Services. KOINONIA ACADEMIC CENTER

OVERT ACT NO. (110): On or about October 16, 2017, JASON SCHROCK emailed Noemi Carvajal to offer to pay for vendor services on behalf of A3 controlled charter schools, specifically "Vendors can make up to \$2,800/student/year or \$280/month/student for 10 months if all services are provided. This includes all of the instruction and curriculum from the vendor. Our charter school will provide the administration, accreditation, back office, and other educational services needed to make sure we are in line with the educational requirements."

OVERT ACT NO. (111): In or around October 2017 through May 2019, Noemi Carvajal provided student master agreements for between 50-70 students to JASON SCHROCK for the students to be enrolled in California Academy of Sports Science Fresno, California Vanguard Fresno, or University Prep Fresno.

OVERT ACT NO. (112): In or around October 2017 through May 2019, Noemi Carvajal provided students enrolled in California Academy of Sports Science Fresno, California Vanguard Fresno, or University Prep Fresno with the full continuum of educational services and support and received \$2800 per year per student from Uplift Monterey.

CHARGES (cont'd)

OVERT ACT NO. (113): On or about and between October 2017 and February 2019, SEAN MCMANUS and JASON SCHROCK, through charter schools they control, enrolled students from Koinonia Academic Center and collected between \$7,083 through \$9,269 per student per year in public funds depending on the age of the student.

OVERT ACT NO. (114): In or around October 2017 through May 2019, Koinonia Academic Center offered a five day per week classroom based instructional program for students in the Fresno Area.

OVERT ACT NO. (115): In or around October 2017 through May 2019, Koinonia Academic Center advertised its school as a faith based program.

ENROLLING TRADITIONAL SCHOOL DISTRICT STUDENTS DURING BREAKS

OVERT ACT NO. (116): In or around December, 2017 JASON SCHROCK and SEAN MCMANUS provided a Winter Camp to Raisin City Elementary School District students by paying Raising City School District employees to provide the program.

OVERT ACT NO. (117): In or around December, 2017 JASON SCHROCK and SEAN MCMANUS, through charter schools they control, enrolled students from the Raisin City Elementary School District for 17 Days of Charter ADA at a profit of over \$300,000.

OVERT ACT NO. (118): On or about December 21, 2017 JASON SCHROCK emailed SEAN MCMANUS and Viku Mehta of Williams Accountancy, explaining a proposed Winter Camp Partnership with Raisin City Elementary School District where students from Raisin City would be enrolled into the charter schools during winter break.

OVERT ACT NO. (119): On or about December 21, 2017 JASON SCHROCK explained to SEAN MCMANUS and Viku Mehta, "We have around 230 master agreements signed and collected, and the remaining 71 students are going to be collected and turned in over the next week. Total of 301 students for 3 weeks all from Raisin City District. We have all student info at the district."

OVERT ACT NO. (120): On or about December 21, 2017 JASON SCHROCK explained the cost and profit breakdown of the proposed winter camp to SEAN MCMANUS and Viku Mehta, "Total cost of camp: Christmas gifts: \$15/student x 301 [=] \$4500[,] Labor: 16 people at \$300 each [=] \$4800[,] Pizza party in January to collect work sample: [=] \$500[,] Total cost: [=] Less than \$10,000[,] Income from camp: [=] 17 days of ADA \$65 X 301 = \$332,605[,] Total Profit for School \$322,605."

OVERT ACT NO. (121): On or about December 21, 2017 SEAN MCMANUS emailed JASON SCHROCK, "Jason we can't cut this check, it needs to come from a school not [sic] us lets discuss[,] do not cut a check Viku thakns sean."

OVERT ACT NO. (122): On or about December 21, 2017 JASON SCHROCK emailed SEAN MCMANUS and Viku Mehta, "Can we loan the school funds now to cut these checks? Less than \$7K I have to pay these people for the campAll have sent in their w-9's, but need to be able to cut them a check before end of December please."

CHARGES (cont'd)

OVERT ACT NO. (123): On or about December 21, 2017 SEAN MCMANUS directed JASON SCHROCK to call him to discuss payments for the winter camp and “we wont see any monet [sic] till march at the earliest” for California Academy Sports Science Fresno.

OVERT ACT NO. (124): On or about December 21, 2017 JASON SCHROCK directed Viku Mehta to prepare invoices in the name of California Academy Sports Science Fresno and not A3 and prepare a loan agreement from A3 to the school to be able to pay.”

ADMINISTRATIVELY SWITCHING SCHOOLS

OVERT ACT NO. (125): In or around and between July 1, 2015 and July 1, 2018, SEAN MCMANUS approved moving full-time online and homeschool students from one charter school to another charter school in a contiguous county without their knowledge in order to generate more than one ADA’s worth of public funding for the student.

OVERT ACT NO. (126): In or around and between July 2017 and May 2019, Ryan Valentine supervised students at the direction of NYLA CRIDER for the entire year including summer and students received additional funds over the summer.

OVERT ACT NO. (127): In or around and between July 2017 and September 2018, Ally Adair-Chung supervised charter school students within the A3 umbrella at the direction of NYLA CRIDER for the entire year including summer and such students received additional funds over the summer.

OVERT ACT NO. (128): On or about July 24, 2018, NYLA CRIDER asked Ally Adair-Chung to log into the Valiant Prep VOS system and switch students on her roster from one charter school to another charter school.

COMPLIANCE WITH FUNDING DETERMINATION SPENDING REQUIREMENTS

OVERT ACT NO. (129): On or about and between January 1, 2017 to February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Academics Arts and Action Charter Academy which conducted business as A3 Education.

OVERT ACT NO. (130): On or about and between January 1, 2017 and February 11, 2019, A3 Education invoiced charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles, for a total of \$25,931,423.52.

OVERT ACT NO. (131): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from A3 Education to CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

CHARGES (cont'd)

OVERT ACT NO. (132): On or about and between January 1, 2017 and February 11, 2019, A3 Education's business bank account that received the paid portions of the invoices did not show business expenses sufficient to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (133): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled A3 Consulting.

OVERT ACT NO. (134): On or about and between January 1, 2017 and February 11, 2019, A3 Consulting invoiced charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara,, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles for a total of \$44,022,947.48.

OVERT ACT NO. (135): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from A3 Consulting to CA STEAM San Bernardino, CA STEAM Santa Barbara, , California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

OVERT ACT NO. (136): On or about and between January 1, 2017 and February 11, 2019, A3 Consulting's business bank account that received the paid portions of the invoices did not show business expenses equivalent to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (137): On or about and between January 1, 2017 to February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Global Consulting Services.

OVERT ACT NO. (138): On or about and between January 1, 2017 to February 11, 2019, Global Consulting Services invoiced Charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles for a total of \$11,743,400.00.

OVERT ACT NO. (139): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from Global Consulting Services to CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

CHARGES (cont'd)

OVERT ACT NO. (140): On or about and between January 1, 2017 and February 11, 2019, Global Consulting Service's business bank account that received the paid portions of the invoices did not show business expenses equivalent to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (141): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Mad Dog Marketing.

OVERT ACT NO. (142): On or about and between January 1, 2017 and February 11, 2019, Mad Dog Marketing invoiced Charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift Santa Barbra, Uplift South, Uplift Monterey, Valiant Academy Southern California, Valiant Academy Los Angeles Valiant Santa Barbara for a total of \$1,605,000.00.

OVERT ACT NO. (143): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from Mad Dog Marketing to CA STEAM San Bernardino, CA STEAM Santa Barbara, , California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

OVERT ACT NO. (144): On or about and between January 1, 2017 and February 11, 2019, Mad Dog Marketing's business bank account that received the paid portions of the invoices did not show business expenses equivalent to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (145): On or about and between November 10, 2015 to February 11, 2019, SEAN MCMANUS and his wife owned Dalkieth Consulting, LLC.

OVERT ACT NO. (146): On or about May 24, 2017, Angela Slepak, on behalf of ROBERT WILLIAMS, requested auditor Chris Thibodeau reallocate payments of \$122,005.544 from Cal Prep Sutter K-7 to A3 Education to Certificated Salaries under Education Program Services.

OVERT ACT NO. (147): On or about May 24, 2017, Angela Slepak, on behalf of ROBERT WILLIAMS, requested auditor Chris Thibodeau reallocate payments of \$18,750 from Cal prep Sutter K-7 to Dalkieth Consulting to Certificated Salaries under Education Program Services.

OVERT ACT NO. (148): On or about May 24, 2017 Angela Slepak, on behalf of ROBERT WILLIAMS, requested auditor Chris Thibodeau reallocate payments of \$119,314.64 from Cal Prep Sutter 8-12 to A3 Education to Certificated Salaries under Education Program Services.

OVERT ACT NO. (149): On or about May 24, 2017, Angela Slepak, on behalf of ROBERT WILLIAMS, requested auditor Chris Thibodeau reallocate payments of \$18,750 from Cal prep Sutter 8-12 to Dalkieth Consulting to Certificated Salaries under Education Program Services.

CHARGES (cont'd)

OVERT ACT NO. (150): On or about May 25, 2017, Chris Thibodeau provided revised audits to ROBERT WILLIAMS with payments to A3 Education and Dalkieth Consulting reflected as teacher salaries.

OVERT ACT NO. (151): On or about May 24, 2017, Angela Slepak, on "behalf of ROBERT WILLIAMS", explained to Chris Thibodeau the need for the change, "these changes greatly affect the funding determination criteria percentages that are submitted to the California Department of Education. For purposes of receiving full funding, 40% of public revenue must be spent on instructional salaries (including 1099) employees), and benefits, and at least 80% of public revenue must be spent on all instructional expenses combined. With the changes mentioned above, California Prep Sutter K-7 and California Prep Sutter 8-12 charter schools will exceed the necessary percentages and receive full funding. Again, we are requesting that the Statement of Functional Expenses is revised to reflect these changes."

OVERT ACT NO. (152): On or about May 26, 2017, ROBERT WILLIAMS provided revised audits to SEAN MCMANUS stating "Pages that were changes is [sic] Audit report Date, page 13 note and functional expenses pages 21 and 22 Still waiting on Eli's [ELI JOHNSON] signature to submit and auditor will submit today or Tuesday."

OVERT ACT NO. (153): On or about May 24, 2017, SEAN MCMANUS and JASON SCHROCK did not pay for any Certificated Salaries from A3 Education or Dalkieth Consulting bank accounts for the charter schools, but instead the charter schools themselves paid for Certificated Salaries.

OVERT ACT NO. (154): On or about May 24, 2017 ROBERT WILLIAMS provided accountancy services to SEAN MCMANUS and JASON SCHROCK for A3 Education and Dalkieth Consulting.

OVERT ACT NO. (155): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK approved paying Michelle Holiday through Homeschool Marketing and Consulting for Valiant Charter Schools to be the featured charter school for Home School Campus.

OVERT ACT NO. (156): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS directed Michelle Holiday to write on all invoices from Homeschool Marketing and Consulting Services that services provided were Educational Services or Instructional Services.

OVERT ACT NO. (157): In or around September 2017, JASON SCHROCK requested Sima Engelstein write on all invoices for West Coast Community Services Inc. "Educational Services" even though she did not provide any direct instruction with students and passed on funds to private schools and families.

OVERT ACT NO. (158): On or about and between January 1, 2017 and February 11, 2019, Enriqueta Luquin monitored spending levels coded as instructional services and certificated salaries of A3 controlled charter schools using QuickBooks.

OVERT ACT NO. (159): On or about and between January 1, 2017 and February 11, 2019, Enriqueta Luquin provided frequent reports to SEAN MCMANUS about expenses coded as instructional services and certificated salaries.

CHARGES (cont'd)

OVERT ACT NO. (160): On or about and between January 1, 2017 and February 11, 2019 SEAN MCMANUS provided additional invoices for payment for A3 Education, A3 Consulting, Global Consulting Services, and/or Mad Dog Marketing labeled as Instructional Services, Educational Services, or Certificated Salaries to allow the charter school to meet 80% spending on instructional services, and/or 40% spending on certificated salaries, prior to budget reports being forwarded to charter authorizers and state agencies.

OVERT ACT NO. (161): On or about and between January 1, 2017 and February 11, 2019 SEAN MCMANUS told Enriqueta Luquin that he could bill for additional Educational Services because he never billed for all of the services he previously provided.

REPRESENTATIONS TO THE AUDITOR

OVERT ACT NO. (162): On or about June 30, 2016, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing JASON SCHROCK as a board member.

OVERT ACT NO. (163): On or about June 30, 2016, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing SEAN MCMANUS as CEO of the nonprofit corporation.

OVERT ACT NO. (164): In or around December, 2017, Chris Thibodeau of Squar Milner, when conducting an annual independent audit of Cal Prep Sutter Charter Schools for the fiscal year ending June 30, 2017, expressed a concern by email to the client about the Cal Prep Sutter Charter Schools relationship with A3 Education, Global Consulting Services and potential fraud.

OVERT ACT NO. (165): On or around December 12, 2017, around 10:55 p.m., in response to concerns from auditor Chris Thibodeau, JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of Cal Prep Sutter Board Minutes from June 25, 2015 that did not state vendor contract for services were discussed at the meeting.

OVERT ACT NO. (166): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter K-7 and A3 Education.

OVERT ACT NO. (167): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter 8-12 and A3 Education.

OVERT ACT NO. (168): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter 8-12 and Global Consulting Services.

OVERT ACT NO. (169): On or about December 13, 2017, around 9:19 a.m., ROBERT WILLIAMS emailed Viku Meta and directed him to print out the documents provided by JASON SCHROCK on December 12, 2017.

CHARGES (cont'd)

OVERT ACT NO. (170): On or about December 13, 2017, around 9:39 a.m., ROBERT WILLIAMS forwarded concerns expressed by Viku Meta to JASON SCHROCK that the Global Consulting services agreement pages were not legible.

OVERT ACT NO. (171): On or about December 13, 2017, around 9:40 a.m., ROBERT WILLIAMS emailed JASON SCHROCK "The minutes or agenda does not refer to approving A3 contract."

OVERT ACT NO. (172): On or about December 13, 2017, around 9:42 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "I'm on the road...can you have Viku make some changes that you need fixed?"

OVERT ACT NO. (173): On or about December 13, 2017, around 9:45 a.m., ROBERT WILLIAMS emailed JASON SCHROCK "No has to come from you without Viku his knowledge These are Board minutes."

OVERT ACT NO. (174): On or about December 13, 2017, around 10:02 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "I'll call you in a little bit what do you need change?"

OVERT ACT NO. (175): On or about December 13, 2017, around 10:03 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "Ok I will go back and fix them."

OVERT ACT NO. (176): On or about December 13, 2017 around 10:05 a.m., ROBERT WILLIAMS emailed JASON SCHROCK concerned that Schrock should not fabricate Board minutes for any meeting that Chris Thibodeau has access to the pre-existing minutes for, stating specifically "Problem is will they contradict anything they already have access to. Can't have two sets of minutes for a meeting."

OVERT ACT NO. (177): On or about December 13, 2017, around 10:30 a.m., JASON SCHROCK emailed ROBERT WILLIAMS new minutes for June 25, 2015 board minutes, now demonstrating that Vendor Contract for Services was approved by the Cal Prep Sutter Board via motion by Trustee Rita "Reece" whose actual name is Rita Reese.

OVERT ACT NO. (178): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of the June 25, 2015 Board minutes JASON SCHROCK revised.

OVERT ACT NO. (179): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of A3 Management Agreements with Cal Prep Sutter K-7 dated June 30, 2015 and electronically signed by "Rita Reece."

OVERT ACT NO. (180): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of A3 Management Agreements with Cal Prep Sutter 8-12 dated June 30, 2015 and electronically signed by "Rita Reece."

OVERT ACT NO. (181): On or about and between June 2015 through May 2019, Rita Reese did not sign any management agreements between Cal Prep Sutter K-7 and A3 Education in her name or as misspelled in the agreement as "Rita Reece."

CHARGES (cont'd)

OVERT ACT NO. (182): On or about and between June 2015 through May 2019, Rita Reese did not sign any management agreements between Cal Prep Sutter 8-12 and A3 Education in her name or as misspelled in the agreement as "Rita Reece."

OVERT ACT NO. (183): On or about December 14, 2017, around 10:11 p.m. SEAN MCMANUS emailed JASON SCHROCK a letter of resignation from Cal Prep Sutter stating that he resigned from CAL PREP Sutter effective June 30, 2016.

OVERT ACT NO. (184): On or about December 14, 2017, around 10:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS with July 6, 2016 board meeting minutes demonstrating SEAN MCMANUS resigned from the charter school and ELI JOHNSON was promoted to the CEO.

OVERT ACT NO. (185): On or about December 15, 2017, around 2:34 p.m., JASON SCHROCK emailed Robert Sikma (Board President) ROBERT WILLIAMS, and SEAN MCMANUS "Please sign and send to the auditor. Eli... please make sure you read and are aware of this letter for us all to be on the same page and response should the auditor calls us again. Thank you sir!"

OVERT ACT NO. (186): On or about December 15, 2017, around 2:46 p.m., ROBERT WILLIAMS emailed JASON SCHROCK, "Did you make any changes? Did Eli [ELI JOHNSON] read so he knows his responsibility when speaking to the auditor? Is it better to be in email form since the questions were email form. We don't want to elevate the correspondence to formal letters."

OVERT ACT NO. (187): On or about December 15, 2017, around 2:49 p.m., JASON SCHROCK emailed ROBERT WILLIAMS, Robert Sikma, SEAN MCMANUS, and ELI JOHNSON "I like the letter response."

OVERT ACT NO. (188): On or about December 15, 2017, around 3:03 p.m., ROBERT WILLIAMS emailed JASON SCHROCK, "Spoke to Rob You will respond to Chris's emails per an email and cc Eli [ELI JOHNSON] on it. It will be done in 20 minutes."

OVERT ACT NO. (189): On or about December 15, 2017, around 3:56 p.m., ELI JOHNSON emailed ROBERT WILLIAMS, JASON SCHROCK, and Robert Sikma, "I have read and I am up to speed on the response from the board."

OVERT ACT NO. (190): On or about December 15, 2017, around 3:57 p.m., ELI JOHNSON emailed ROBERT WILLIAMS, JASON SCHROCK, and Robert Sikma "If Chris calls me I will let you know before calling him back."

OVERT ACT NO. (191): On or about December 15, 2017, around 3:57 p.m., SEAN MCMANUS emailed JASON SCHROCK, ELI JOHNSON, ROBERT WILLIAMS, and Robert Sikma, "Eli I think it would be best if you not speak to the auditor at this point, if he reaches out please contact Jason [JASON SCHROCK]."

OVERT ACT NO. (192): On or about December 15, 2017, around 4:02 p.m., ELI JOHNSON emailed SEAN MCMANUS and ROBERT WILLIAMS, JASON SCHROCK, and Robert Sikma, "Will do" taking direction from SEAN MCMANUS and demonstrating SEAN MCMANUS was still in control of Cal Prep Sutter.

CHARGES (cont'd)

OVERT ACT NO. (193): On or about December 15, 2017, Robert Sikma emailed auditor Chris Thibodeau at the direction of SEAN MCMANUS, JASON SCHROCK, and ROBERT WILLIAMS that contained false statements meant to shield payments made to A3 Education and Global Consulting Services and the relationship between SEAN MCMANUS and Cal Prep Sutter Charter Schools.

OVERT ACT NO. (194): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "Mr. Eli Johnson is the CEO of California Prep Sutter" when, in fact, ELI JOHNSON actually reported to SEAN MCMANUS.

OVERT ACT NO. (195): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "Within Eli's role as CEO, he is responsible for the review of the financial statements and audit information."

OVERT ACT NO. (196): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "All payments made to A3 and Global Consulting have been appropriately approved per the process mentioned above. The Memorandum of Understanding between A3 and the school and Global Consulting and the school have been reviewed and approved by the Board of Directors, see enclosed board minutes"

OVERT ACT NO. (197): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "The American Express card is in the name of Sean McManus. However, Richard Nguyen, the business manager is in possession of this card and authorizes the purchases."

OVERT ACT NO. (198): On or about December 15, 2017 Robert Sikma forwarded his letter to auditor Chris Thibodeau to JASON SCHROCK, ROBERT WILLIAMS, and ELI JOHNSON and indicated he did so to ensure "we are all on the same page."

OVERT ACT NO. (199): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools dated June 30, 2017.

OVERT ACT NO. (200): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing JASON SCHROCK as a board member.

OVERT ACT NO. (201): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing SEAN MCMANUS as CEO.

OVERT ACT NO. (202): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing ELI JOHNSON as the administrator of the school.

OVERT ACT NO. (203): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools identifying that the charter school engaged in related party transactions with SEAN MCMANUS.

CHARGES (cont'd)

OVERT ACT NO. (204): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter lacked internal controls because the school used check disbursements from "a signature of an individual that is not involved in management or the Board of Directors."

OVERT ACT NO. (205): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter did not provide evidence that journal entries and invoices were reviewed and authorized, as evidenced by initial or signature.

OVERT ACT NO. (206): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter did "not provide documentation to support several invoices and journal entries."

OVERT ACT NO. (207): On or about February 15, 2017, CA PREP Sutter Charter Schools (C3625043) business filings no longer showed SEAN MCMANUS as the registered agent.

OVERT ACT NO. (208): In or around December 2018, CA PREP Sutter Charter Schools hired Jeffrey Hill to conduct its annual audit instead of SquarMilner which reported finding related party transactions, and findings related to improper invoicing and payments during the prior year's audit.

SEEKING AUTHORIZATION FROM SMALL SCHOOL DISTRICTS

OVERT ACT NO. (209): In or around July, 2015, SEAN MCMANUS and Rita Reese sought and obtained authorization for California Prep Sutter K-7 from the Meridian Elementary School District.

OVERT ACT NO. (210): In or around July, 2015, SEAN MCMANUS and Rita Reese sought and obtained authorization for California Prep Sutter 8-12 from the Meridian Elementary School District.

OVERT ACT NO. (211): In or around July 2015, Meridian Elementary School District was a school district with around 75 annual ADA.

OVERT ACT NO. (212): In or around March, 2016, ELI JOHNSON submitted a charter petition to Liberty School District and was granted authorization for CA STEAM Sonoma .

OVERT ACT NO. (213): In or around March 2016, Liberty Elementary School District was a school district with around 200 annual ADA.

OVERT ACT NO. (214): In or around April 2017, ELI JOHNSON submitted a charter petition to and was granted authorization for CA STEAM Sonoma II by the Guerneville Elementary School District.

OVERT ACT NO. (215): In or around April 2017, Guerneville Elementary School District was a school district with around 270 annual ADA.

CHARGES (cont'd)

OVERT ACT NO. (216): On or about and between January 2016 and August 2016, SEAN MCMANUS and ELI JOHNSON attended a board meeting of the Trona Joint Unified School District and proposed the district authorize CA STEAM San Bernardino because as a small school district Trona could make profit from oversight fees and could earn free summer school.

OVERT ACT NO. (217): In or around July 2016, ELI JOHNSON submitted a charter petition to and was granted authorization for CA STEAM San Bernardino by the Trona Joint Unified School District.

OVERT ACT NO. (218): On or about April 16, 2018, ELI JOHNSON and JUSTIN SCHMITT submitted a charter petition to the Trona Joint Unified School District and were granted authorization for University PREP San Bernardino.

OVERT ACT NO. (219): In or around July 2016, Trona Joint Unified School District was a school district with around 250 annual ADA.

OVERT ACT NO. (220): In or around July 2016, ELI JOHNSON submitted a charter petition for CA STEAM Santa Barbara to the Cuyama Joint Unified School District and was granted authorization.

OVERT ACT NO. (221): In or around July, 2017, ELI JOHNSON submitted a charter petition to and was granted authorization for Valiant Santa Barbara by the Cuyama Joint Unified School District.

OVERT ACT NO. (222): In or around July, 2017, ELI JOHNSON submitted a charter petition to the Cuyama Joint Unified School District and was granted authorization for Uplift Santa Barbara.

OVERT ACT NO. (223): In or around and between July 2016 and July 2017, Cuyama Joint Unified School District was a school district with around 200 annual ADA.

OVERT ACT NO. (224): On or about August 10, 2017, JUSTIN SCHMITT submitted a charter petition to and was granted authorization for California Academy of Sports Science by the Dehesa Elementary School District.

OVERT ACT NO. (225): On or around May 8, 2018, JUSTIN SCHMITT submitted a charter petition and obtained authorization for University Prep from the Dehesa Elementary School District.

OVERT ACT NO. (226): In or around and between August 2017 and May 2018, Dehesa Elementary School District was a school district with around 135 annual ADA.

OVERT ACT NO. (227): On or about August 23, 2016, at the direction of SEAN MCMANUS, Luiz Rigney submitted a charter petition to and was granted authorization for UPLIFT California Monterey Charter School by Bradley Union School District.

OVERT ACT NO. (228): In or around July, 2017, at the direction of SEAN MCMANUS, Luiz Rigney submitted a charter petition to and was granted authorization for Uplift California North by the Bradley Elementary School District.

CHARGES (cont'd)

OVERT ACT NO. (229): In or around July, 2017, at the direction of SEAN MCMANUS, Luiz Rigney submitted a charter petition to and was granted authorization for Uplift California South by the Bradley Elementary School District.

OVERT ACT NO. (230): In or around August 2016, Bradley Union School District was a school district with around 75 annual ADA.

OVERT ACT NO. (231): On or around and between July 2017 and January 2018, at the direction of JASON SCHROCK, Fernando Napoles petitioned for and obtained authorization for the California Academy of Sports Science Fresno from the Raisin City Elementary School District.

OVERT ACT NO. (232): On or about March 29, 2018, at the direction of JASON SCHROCK, Fernando Napoles submitted a charter petition to and was granted authorization for University PREP Fresno Charter School by the Raisin City Elementary School District.

OVERT ACT NO. (233): On or about May 1, 2018, at the direction of JASON SCHROCK, Fernando Napoles submitted a charter petition to and was granted authorization for California Vanguard Academy-Fresno Charter School by the Raisin City Elementary School District.

OVERT ACT NO. (234): In or around and between July 2017 and May 2018 Raisin City Elementary School District was a school district with around 280 annual ADA.

IDENTIFYING SUBORDINATE PARTIES AS CHARTER SCHOOL LEADERS ON PUBLIC DOCUMENTS

OVERT ACT NO. (235): On or about and between July 2015 to May 2019, ELI JOHNSON served as a subordinate to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (236): On or about and between July 2015 to May 2019, JUSTIN SCHMITT served as a subordinate to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (237): On or about and between July 2016 to May 2019, Luiz Rigney served as a subordinate to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (238): On or about and between July 2017 to May 2019, Fernando Napoles served as a subordinate to JASON SCHROCK.

CAL PREP SUTTER CHARTER SCHOOLS (K-7 & 8-12)

OVERT ACT NO. (239): On or about and Between July 2015 and May 2019, ELI JOHNSON served as the contact person for Cal Prep Sutter K-7 and Meridian Elementary School District, despite being a subordinate to SEAN MCMANUS and JASON SCHROCK.

CHARGES (cont'd)

OVERT ACT NO. (240): On or about and Between July 2015 and April 2015, ELI JOHNSON served as the contact person for Cal Prep Sutter 8-12 and Meridian Elementary School District, despite being a subordinate to SEAN MCMANUS.

OVERT ACT NO. (241): On or about November 23, 2015 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal PREP Sutter K-7 certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (242): On or about December 14, 2017, SEAN MCMANUS and JASON SCHROCK fabricated a letter of resignation and corresponding board minutes for SEAN MCMANUS in order to appease Chris Thibodeau of Squar Milner who questioned whether ELI JOHNSON was the CEO of Cal Prep Sutter Charter Schools.

OVERT ACT NO. (243): On or about February 9, 2017 SEAN MCMANUS directed ROBERT WILLIAMS and Angela Slepak to submit Statements of Information for Cal Prep Sutter Charter Schools and list ELI JOHNSON as the CEO.

OVERT ACT NO. (244): On or about February 15, 2015, ROBERT WILLIAMS submitted a statement of information for California Prep Sutter Charter Schools (C3625043) and listed ELI JOHNSON as the CEO.

OVERT ACT NO. (245): In or around June 2017, the funding determination form for California Prep Sutter K-7 submitted to the Advisory Commission on Charter Schools listed ELI JOHNSON as the COO of California Prep Sutter K-7.

OVERT ACT NO. (246): In or around June 2017, the funding determination form for California Prep Sutter 8-12 submitted to the Advisory Commission on Charter Schools listed ELI JOHNSON as the COO of California Prep Sutter 8-12.

OVERT ACT NO. (247): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools dated June 30, 2017 based on documentation provided by SEAN MCMANUS, JASON SCHROCK, and/or their subordinates.

OVERT ACT NO. (248): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing SEAN MCMANUS as CEO.

OVERT ACT NO. (249): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing ELI JOHNSON as the administrator of the school.

OVERT ACT NO. (250): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

CHARGES (cont'd)

OVERT ACT NO. (251): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018 listed ELI JOHNSON as administrator of the school instead of SEAN MCMANUS.

OVERT ACT NO. (252): In or around and between the November 2015 and April 30, 2019, ELI JOHNSON told Anne Sykes of Meridian Elementary School District that Cal Prep Sutter was the only charter school he worked with.

OVERT ACT NO. (253): On or about and between July 1, 2015 and February 20, 2019, the CDE information page for Cal prep Sutter K-7 listed ELI Johnson as the Chief Academic Officer and Chief Business Official of Cal Prep Sutter K-7.

OVERT ACT NO. (254): On or about February 20, 2019, the CDE information page for Cal Prep Sutter 8-12 listed ELI Johnson as the Chief Academic Officer and Chief Business Official of Cal Prep Sutter 8-12.

CA STEAM SONOMA/II

OVERT ACT NO. (255): On or about and between July 2016 and February 2017, ELI JOHNSON served as the contact person for CA STEAM Sonoma, despite being a subordinate to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (256): On or about and between July 2017 and May 2019, ELI JOHNSON served as the contact person for CA STEAM Sonoma II, despite being a subordinate to SEAN MCMANUS.

OVERT ACT NO. (257): On or about March 11, 2016, SEAN MCMANUS filed Articles of Incorporation for CA STEAM Sonoma (3884753).

OVERT ACT NO. (258): On or about March 11, 2016 CA STEAM Sonoma (3884753) Bylaws designated A3 Education as its Sole Statutory Member.

OVERT ACT NO. (259): On or about February 15, 2017, ROBERT WILLIAMS filed an updated business filing for CA STEAM Sonoma (3884753) removing SEAN MCMANUS and listing ELI JOHNSON as CEO for CA STEAM Sonoma.

OVERT ACT NO. (260): On or about April 10, 2017, charter petition for CA STEAM Sonoma II listed ELI JOHNSON as lead petitioner and contact for the school to Guerneville Elementary School District.

OVERT ACT NO. (261): On or around October 23, 2017, Liberty Elementary School District issued a Notice of Violation for CA STEAM Sonoma addressed to ELI JOHNSON believing him to be the Executive Director.

OVERT ACT NO. (262): On or around October 23, 2017, Liberty Elementary School District issued a Notice of Violation for CA STEAM Sonoma indicating ELI JOHNSON was nonresponsive to requests for information.

CHARGES (cont'd)

OVERT ACT NO. (263): On or around October 23, 2017, Liberty Elementary School District issued a Notice of Violation for CA STEAM Sonoma indicating CA STEAM SONOMA submitted "extremely inaccurate" first interim report and ELI JOHNSON could not justify egregious errors.

OVERT ACT NO. (264): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (265): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, and listed ELI JOHNSON as the Administrator of the school.

OVERT ACT NO. (266): On or about January 19, 2018, CA STEAM SONOMA voluntarily closed in lieu of having their charter revoked by Liberty School District due to fiscal mismanagement and charter violations.

OVERT ACT NO. (267): In or around February, 2018, funding determination form for CA STEAM Sonoma II submitted to the Advisory Commission on Charter Schools, listed ELI Johnson as the Administrator of CA STEAM Sonoma II.

OVERT ACT NO. (268): In or around April, 2018, funding determination form for CA STEAM Sonoma submitted to the Advisory Commission on Charter Schools, listed ELI JOHNSON as the COO of CA STEAM Sonoma.

OVERT ACT NO. (269): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (270): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018 and listed ELI JOHNSON as the Executive Director.

OVERT ACT NO. (271): On or about and between July 1, 2016 and February 21, 2019, the CDE information page for CA STEAM Sonoma listed ELI Johnson as the Administrator for CA STEAM Sonoma.

OVERT ACT NO. (272): On or about February 21, 2019, the CDE information page for CA STEAM Sonoma II listed ELI Johnson as the Administrator for CA STEAM Sonoma.

CA STEAM SAN BERNARDINO

OVERT ACT NO. (273): On or about and between July 2016 and May 2019, ELI JOHNSON served as the contact between CA STEAM San Bernardino and Trona Joint Unified School District, despite being a subordinate to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (274): On or about July 1, 2016, the charter petition for CA STEAM San Bernardino listed ELI JOHNSON as lead petitioner and contact for the school to Trona Joint Unified School District.

CHARGES (cont'd)

OVERT ACT NO. (275): On or about and between July 1, 2016 to February 11, 2019, ELI JOHNSON served as the contact person to Trona Joint Unified School District for CA STEAM San Bernardino.

OVERT ACT NO. (276): On or about September 15, 2016 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal STEAM San Bernardino certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (277): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (278): On or about December 8, 2017, Jeffrey Hill submitted an audit for CA STEAM San Bernardino dated June 30, 2017 and listed ELI JOHNSON as the Administrator of the school.

OVERT ACT NO. (279): In or around April 18, 2018, the funding determination form submitted to the Advisory Commission on Charter Schools listed ELI JOHNSON as the Administrator of the school.

OVERT ACT NO. (280): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (281): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (282): On or about February 20, 2019, the CDE information page for CA STEAM San Bernardino listed ELI Johnson as the Administrator for CA STEAM San Bernardino.

CA STEAM SANTA BARBARA

OVERT ACT NO. (283): On or about and between July 2017 and May 2019, ELI JOHNSON served as the contact between CA STEAM Santa Barbara and Cuyama Joint Unified School District, despite being a subordinate to SEAN MCMANUS and JASON SCHROCK..

OVERT ACT NO. (284): On or about July 1, 2016, the charter petition for CA STEAM Santa Barbara listed ELI JOHNSON as contact for the school to Cuyama Joint Unified School District.

OVERT ACT NO. (285): On or about September 15, 2016 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal STEAM Santa Barbara certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (286): On or about June 13, 2017, CA STEAM Santa Barbara (C3953915) replaced JASON SCHROCK as registered agent with ELI JOHNSON on the business filing.

CHARGES (cont'd)

OVERT ACT NO. (287): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (288): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, and listed ELI JOHNSON as the Superintendent of the school.

OVERT ACT NO. (289): In or around April 18, 2018, the funding determination form submitted to the Advisory Commission on Charter Schools listed ELI JOHNSON as the Administrator of CA STEAM Santa Barbara.

OVERT ACT NO. (290): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (291): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018, and listed ELI JOHNSON as the administrator of the school.

OVERT ACT NO. (292): On or about February 20, 2019, the CDE information page for CA STEAM Santa Barbara listed ELI JOHNSON as the Administrator for CA STEAM Santa Barbara.

VALIANT ACADEMY SOUTHERN CALIFORNIA

OVERT ACT NO. (293): On or about and between November 2016 and May 2019, JUSTIN SCHMITT served as the contact between Valiant Academy Southern California and Dehesa Elementary School District, despite being a subordinate to SEAN MCMANUS.

OVERT ACT NO. (294): On or about September 8, 2017, JASON SCHROCK filed an updated statement of information for Valiant Academy San Diego (C3966287), identifying himself as the Chief Financial Officer.

OVERT ACT NO. (295): On or about August 17, 2018, ROBERT WILLIAMS filed an updated statement of information for Valiant Academy of Southern California (C3966287) removing JASON SCHROCK as the CFO.

OVERT ACT NO. (296): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (297): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017 which listed JASON SCHROCK as the President of the school.

OVERT ACT NO. (298): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017 which listed JUSTIN SCHMITT as the Director of the school.

CHARGES (cont'd)

OVERT ACT NO. (299): On or about November 2, 2018, JASON SCHROCK emailed Francis Price and Christina Bays requesting his signature be removed from checks for Valiant SD and to replace them with Robert Sikma.

OVERT ACT NO. (300): In or around December 2017, the funding determination form submitted to the Advisory Commission on Charter Schools for Valiant Academy of Southern California identified Justin Schmitt as the administrator.

OVERT ACT NO. (301): On or about February 22, 2019, the CDE information page for Valiant Academy of Southern California listed JUSTIN SCHMITT as the Administrator for Valiant Academy Southern California.

VALIANT ACADEMY OF LOS ANGELES

OVERT ACT NO. (302): On or about and between November 2016 and May 2019, JUSTIN SCHMITT served as the contact between Valiant Academy Los Angeles and Acton Agua Dulce Unified District, despite being a subordinate to SEAN MCMANUS.

OVERT ACT NO. (303): On or about September 8, 2017, JASON SCHROCK filed an updated statement of information for Valiant Academy LA (C3966286), identifying himself as the Chief Financial Officer.

OVERT ACT NO. (304): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 based on information provided to him by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (305): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 and listed JASON SCHROCK as the President of the school.

OVERT ACT NO. (306): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 and listed JUSTIN SCHMITT as the Director of the school.

OVERT ACT NO. (307): On or about August 17, 2018, ROBERT WILLIAMS filed an updated statement of information for Valiant Academy LA (C3966286) removing JASON SCHROCK as the CFO.

OVERT ACT NO. (308): On or about November 2, 2018, JASON SCHROCK emailed Francis Price and Christina Bays requesting that his signature be removed from checks for Valiant LA and to replace them with Robert Sikma.

OVERT ACT NO. (309): On or about February 22, 2019, the CDE information page for Valiant Academy of Los Angeles listed JUSTIN SCHMITT as the Director of Schools for Valiant Academy of Los Angeles.

VALIANT SANTA BARBARA

OVERT ACT NO. (310): On or about and between July 2017 and May 2019, ELI JOHNSON served as the contact between Valiant Academy Southern California and Cuyama Joint Unified School District, despite being a subordinate to SEAN MCMANUS.

CHARGES (cont'd)

OVERT ACT NO. (311): On or about July 1, 2017, the charter petition for Valiant Santa Barbara listed ELI JOHNSON as lead petitioner and contact for the school with Cuyama Joint Unified School District.

OVERT ACT NO. (312): In or around February 2018, the funding determination form submitted to the Advisory Commission on charter schools identified ELI JOHNSON as the Administrator of Valiant Santa Barbara.

OVERT ACT NO. (313): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (314): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018, the annual audit for Valiant Santa Barbara listed ELI JOHNSON as the administrator.

OVERT ACT NO. (315): On or about February 22, 2019, the CDE information page for Valiant Santa Barbara listed ELI JOHNSON as the Director of Schools for Valiant Academy Santa Barbara.

UPLIFT CALIFORNIA (MONTEREY)

OVERT ACT NO. (316): On or about and between July 2017 and May 2019, Luiz Rigney served as the contact between Uplift Monterey and Bradley Union School District, despite being a subordinate to SEAN MCMANUS.

OVERT ACT NO. (317): On or about July 2016-July 2017, SEAN MCMANUS directed Luiz Rigney to not disclose the existence of A3 Education (and his role) to Bradley Union School District because it complicates things.

OVERT ACT NO. (318): On or about July 1, 2016, the charter petition for Uplift Monterey listed Luiz Rigney as the lead petitioner and contact for the school with Bradley Union School District.

OVERT ACT NO. (319): On or about July 25, 2016, SEAN MCMANUS directed Luiz Rigney to fill out paperwork to register UPLIFT California Charter Schools (C3930004) as a non-profit corporation in the State of California and claim he is the chief officer of Uplift California Charter Schools.

OVERT ACT NO. (320): On or about and between August 2016 and May 2017, Luiz Rigney asked SEAN MCMANUS to remove his name from the corporate paperwork for UPLIFT California Charter Schools (C3930004) because he was not the CEO of Uplift Charter Schools.

OVERT ACT NO. (321): On or about March 8, 2017, ROBERT WILLIAMS filed an updated statement of information for Uplift California Charter Schools (C3930004), identifying ELI JOHNSON as the CEO, Secretary, and Chief Financial Officer for Uplift California Charter Schools.

OVERT ACT NO. (322): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

CHARGES (cont'd)

OVERT ACT NO. (323): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterrey dated June 30, 2017 and listed ELI JOHNSON as the Superintendent of the school.

OVERT ACT NO. (324): In or around April 2018, the funding determination form submitted to the Advisory Commission on Charter Schools for Uplift Monterrey indicated that ELI JOHNSON was the Administrator and Charter School Director of Uplift Monterrey.

OVERT ACT NO. (325): On or about February 22, 2019, the CDE information page for Uplift Monterrey listed RICHARD NGUYEN as the Chief Business Official and Business Manager for Uplift Monterrey.

UPLIFT SANTA BARBARA

OVERT ACT NO. (326): On or about October 27, 2017, Articles of Incorporation were filed bearing the name and signature of Lambert Sikkema, but without Lambert Sikkema's knowledge or approval.

OVERT ACT NO. (327): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (328): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018 and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (329): On or about February 22, 2019, the CDE information page for Uplift Santa Barbara listed ELI JOHNSON's email as the email for contacting Uplift Santa Barbara.

OVERT ACT NO. (330): In or around February 2018, the funding determination form submitted to the Advisory Commission on Charter Schools for Uplift Santa Barbara indicated that ELI JOHNSON was the Administrator and Charter School Director of Uplift Monterrey.

UPLIFT CALIFORNIA NORTH

OVERT ACT NO. (331): On or about July 1, 2017, the charter petition for Uplift CA North listed Luiz Rigney as lead petitioner and contact for the school to Bradley Elementary School District.

OVERT ACT NO. (332): On or about February 22, 2019, the CDE information page for Uplift Santa Barbara listed Luiz Rigney's email as the contact email for Uplift California North.

UPLIFT CALIFORNIA SOUTH

OVERT ACT NO. (333): On or about July 1, 2017, the charter petition for Uplift CA South listed Luiz Rigney as lead petitioner and contact for the school to Bradley Elementary School District.

CHARGES (cont'd)

OVERT ACT NO. (334): On or about February 22, 2019, the CDE information page for Uplift Santa Barbara listed Luiz Rigney's email as the contact email for Uplift California North.

CALIFORNIA ACADEMY OF SPORTS SCIENCE

OVERT ACT NO. (335): In or around February 2016, the funding determination form submitted to the Advisory Commission on Charter Schools listed JUSTIN SCHMITT as the Administrator for California Academy of Sports Science.

OVERT ACT NO. (336): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (337): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018, that Listed ELI JOHNSON as the Administrator for California Academy of Sports Science.

OVERT ACT NO. (338): On or about February 21, 2019, the CDE information page for California Academy of Sports Science listed JUSTIN SCHMITT as the Administrator for California Academy of Sports Science.

CALIFORNIA ACADEMY OF SPORTS SCIENCE FRESNO

OVERT ACT NO. (339): On or about February 21, 2019, the CDE information page for California Academy of Sports Science Fresno listed Viku Mehta, employee of ROBERT WILLIAMS as the Chief Business Official.
UNIVERSITY PREP

OVERT ACT NO. (340): On or about May 8, 2018, the charter petition for University PREP designated JUSTIN SCHMITT as the lead petitioner and contact for the charter school to Trona Joint Unified School District.

OVERT ACT NO. (341): On or about September 20, 2018, Viku Mehta, employee of ROBERT WILLIAMS, submitted an annual business filing for University PREP Charter (C4161006).

OVERT ACT NO. (342): On or about September 20, 2018, the annual business filing for University PREP Charter (C4161006) listed Jessica Bulk as the Secretary and Lambert Sikkema as the CFO.

OVERT ACT NO. (343): On or about September 20, 2018, Jessica Bulk and Lambert Sikkema were unaware their names were used on corporate documents.

OVERT ACT NO. (344): On or about November 8, 2018 JUSTIN SCHMITT submitted a 20 Day Attendance Data Certification for University Prep to the California Department of Education as the Charter School Representative.

CHARGES (cont'd)

OVERT ACT NO. (345): On or about February 24, 2019, the CDE information page for University Prep listed ROBERT WILLIAMS as the Chief Business Official for University Prep.

UNIVERSITY PREP SAN BERNARDINO

OVERT ACT NO. (346): On or about November 8, 2018 RICHARD NGUYEN submitted a 20 Day Attendance Data Certification for University Prep San Bernardino as the Charter School Representative.

OVERT ACT NO. (347): On or about April 16, 2018, the charter petition for University PREP San Bernardino designated ELI JOHNSON as the lead petitioner and contact for the charter school to Trona Joint Unified School District.

OVERT ACT NO. (348): On or about July 2, 2018, Viku Mehta, an employee of ROBERT WILLIAMS registered University PREP San Bernardino Charter School (C4170889) as a non-profit corporation.

UNIVERSITY PREP FRESNO:

OVERT ACT NO. (349): On or about March 29, 2018, the charter petition for University Prep Fresno listed Fernando Napoles as the lead petitioner and contact for the school to the Raisin City Elementary School District.

CALIFORNIA VANGUARD ACADEMY FRESNO:

OVERT ACT NO. (350): On or about May 1, 2018, the charter petition for California Vanguard Academy-Fresno identified Fernando Napoles as the lead petitioner and contact person for the charter school to the Raisin City Elementary School District.

COUNT 3 - CONSPIRACY TO COMMIT A CRIME

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JUSTIN KENT SCHMITT, JASON ALAN SCHROCK, ELI RALPH JOHNSON, RICHARD BA NGUYEN, STEVEN BRAIN ZANT, and ROBERT JOHN WILLIAMS did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Theft of Public Funds, Penal Codes Section 424 Charging for services not provided to facilitate transferring public funds to business entities owned/operate by Sean McManus and Jason Schrock, in violation of PENAL CODE SECTION 182(a)(1).

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

CHARGES (cont'd)

The object of the conspiracy was to generate public funds from charter schools under their control and misappropriate those funds by transferring them to private companies operated and/or owned by Conspirators under cover of providing educational and instructional services when no such services were provided by those companies. Conspirators themselves, and through subordinates courted small school districts across California who were suffering budget woes and requested they authorize charter schools as a means to generate additional state funding for the district in the form of oversight fees. Conspirators took measures to disguise their relationship as manager and operator of both the charter schools and private vendors and charter management organizations. Conspirators, while in total control of all of the finances for the charter schools, invoiced to the charter schools and paid out to companies they owned and controlled for educational and instructional services that were not provided.

Academics Arts and Action Charter Academy dba A3 Education

OVERT ACT NO. (1): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Academics Arts and Action Charter Academy which does business as A3 Education.

OVERT ACT NO. (2): On or about and between January 1, 2017 and February 11, 2019, A3 Education invoiced charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles, for a total of \$25,931,423.52.

OVERT ACT NO. (3): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK operated and controlled CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles at such time when they contracted with A3 Education.

OVERT ACT NO. (4): On or about and between January 1, 2017 and February 11, 2019, funds paid from A3 Education business account's payroll were primarily paid to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (5): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from A3 Education to CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

OVERT ACT NO. (6): On or about and between January 1, 2017 and February 11, 2019, A3 Education's business bank account that received the paid portions of the invoices did not show business expenses equivalent to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

CHARGES (cont'd)

OVERT ACT NO. (7): On or about and between January 1, 2017 to February 11, 2019, expenses for services allegedly provided on invoices from A3 Education to the charter schools such as instructional services, marketing, IT Services, and CALPADS, were actually paid for from the charter school bank accounts separate from the payments to A3 Education.

OVERT ACT NO. (8): On or about February 17, 2015, SEAN MCMANUS and JASON SCHROCK filed CA business file C3757752 with EIN#47-5353078 under the complete name Academics, Arts and Action Charter Academies (A3 Education) for the stated purpose to "operate public charter schools".

OVERT ACT NO. (9): In or around February 2015, the Form 990 for A3 Education lists Marc Veldhuizen as the chairman of A3 Education. Marc Veldhuizen is the brother-in-law of JASON SCHROCK.

OVERT ACT NO. (10): On October 20, 2015, SEAN MCMANUS placed his newly opened Farmers & Merchants bank account under the name Academics, Arts and Action Charter Academy (A3 Education).

OVERT ACT NO. (11): On October 20, 2015, SEAN MCMANUS was designated as the acting CEO/Secretary of A3 Education on the Farmers & Merchants bank account (270**1).

OVERT ACT NO. (12): On or about September 7, 2016, JASON SCHROCK was added as the only other authorized signer for the A3 Education bank account at Farmers & Merchants Bank #270****1.

OVERT ACT NO. (13): On or about September 7, 2016, documents for bank account #270****1 at Farmers & Merchants Bank identified SEAN MCMANUS as an employee of California Prep.

OVERT ACT NO. (14): On or about September 7, 2016, documents for bank account #270****1 at Farmers & Merchants Bank identified JASON SCHROCK as an employee of A3 Education.

OVERT ACT NO. (15): On or about September 7, 2016, the A3 Education Board approved a resolution authorizing the opening of Farmers & Merchants Bank account #270****1 for A3 Education and listed SEAN MCMANUS as the President/Secretary for both the account and the non-profit.

OVERT ACT NO. (16): On or about September 7, 2016, the A3 Education Board approved a resolution authorizing the opening of Farmers & Merchants Bank account #270****1 for A3 Education and listed JASON SCHROCK as an authorized signer on the account.

OVERT ACT NO. (17): In or around and between October 2016 and May 2017, SEAN MCMANUS directed Sarah Browne, former employee of Robert Williams, to not tell anyone how much money A3 Education makes or his salary from A3 Education when she was assigned to work in operations for the charter schools.

OVERT ACT NO. (18): On or about January 12, 2017, JASON SCHROCK directed Angela Slepak to not show A3 financials to Damien Jenkins or anyone within the organization, stating "Please only show financials of A3 to Sean and Jason. Do not pass the financials of A3 out to anyone else at this time. Thanks!"

CHARGES (cont'd)

OVERT ACT NO. (19): On or about March 10, 2017, an annual business filing for A3 Education (C3757752) listed SEAN MCMANUS as CEO/Secretary of the corporation.

OVERT ACT NO. (20): On or about March 10, 2017, an annual business filing for A3 Education (C3757752) listed JASON SCHROCK as CFO of the corporation.

OVERT ACT NO. (21): On or about March 10, 2017, an annual business filing for A3 Education (C3757752) listed 3300 Irvine Ave, Suite #330, Newport Beach, CA 92660 as its corporate address.

OVERT ACT NO. (22): In or around December 2017, SEAN MCMANUS and JASON SCHROCK wired \$1,622,718.43 from A3 Education for Global Consulting Services to purchase a private residence for SEAN MCMANUS in San Juan Capistrano.

OVERT ACT NO. (23): In or around December 2017, SEAN MCMANUS and JASON SCHROCK held title to the San Juan Capistrano as joint tenants, after purchasing the property with A3 Education funds.

OVERT ACT NO. (24): On or about January 1, 2018, SEAN MCMANUS sought to refinance the house he purchased with A3 Education Funds and take out \$1,000,000; but was ultimately denied.

OVERT ACT NO. (25): A3 Agreements in existence identify A3 Education as the Sole Statutory Member of the Charter Schools.

OVERT ACT NO. (26): On or about April 10, 2018, JASON SCHROCK texted Jim Konantz about what board members to use on upcoming charters.

OVERT ACT NO. (27): On or about November 11, 2017, SEAN MCMANUS texted Nyla Crider and directed her to describe A3 Education as "vendors" when speaking of A3 Education's role to Valiant.

OVERT ACT NO. (28): On or about November 11, 2017, Nyla Crider texted SEAN MCMANUS that she told other people A3 Education was a management company.

OVERT ACT NO. (29): On or about November 11, 2017, SEAN MCMANUS responded to Nyla Crider, stating he never understood why people got "wound up" about the management company side of things.

OVERT ACT NO. (30): SEAN MCMANUS stating people got wound up about the management company side of things because SEAN MCMANUS friend's Nick and Steve had ruined it.

OVERT ACT NO. (31): On or about November 11, 2017, SEAN MCMANUS texted Nyla Crider responding "thankfully we run a tight ship."

OVERT ACT NO. (32): On or about and between July 1, 2017 and July 1, 2018, SEAN MCMANUS directed Luiz Rigney to not mention A3 Education when he was seeking authorization from school districts.

CHARGES (cont'd)

A3 CONSULTING:

OVERT ACT NO. (33): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled A3 Consulting.

OVERT ACT NO. (34): On or about and between January 1, 2017 and February 11, 2019, A3 Consulting invoiced charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles for a total of \$44,022,947.48.

OVERT ACT NO. (35): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from A3 Consulting to CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

OVERT ACT NO. (36): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK operated and controlled CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles at such time when they contracted with A3 Consulting.

OVERT ACT NO. (37): On or about August 14, 2018, Sean Joseph McManus and Jason Schrock opened a bank account in the name of A3 Consulting at Farmers & Merchants bank (270****1).

OVERT ACT NO. (38): On or about August 14, 2018, Sean McManus and Jason Schrock submitted a 'board resolution' to Farmers & Merchants bank in support of opening the bank account (270****1) which listed Sean McManus as the President/CEO of A3 Consulting and Jason Schrock as the Secretary of A3 Consulting.

OVERT ACT NO. (39): On or about August 13, 2018, Jason Schrock wrote, signed and submitted a letter to Farmers & Merchants bank, in support of opening the account (270****1) stating "This business is set up for operations outside of California and we would like to have this bank account opened as of 8-12-18". The letter listed Sean McManus and Jason Schrock on behalf of A3 Consulting Inc.

OVERT ACT NO. (40): On or about June 25, 2018, Sean McManus signed and submitted nine (9) W9 forms for A3 Consulting to charter school accounts within Bill.com for funding purposes.

OVERT ACT NO. (41): On or about and between January 1, 2017 and February 11, 2019, A3 Consulting's business bank account that received the paid portions of the invoices did not show business expenses equivalent to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

CHARGES (cont'd)

OVERT ACT NO. (42): On or about and between January 1, 2017 to February 11, 2019, expenses for services allegedly provided on invoices from A3 Consulting to the charter schools such as instructional services, marketing, IT Services, and CALPADS were paid for from the charter school bank accounts separate from payments to A3 Consulting.

OVERT ACT NO. (43): On or about November 14, 2017, A3 Consulting (WY-2017-000776260) was registered as a for-profit corporation in the State of Wyoming.

OVERT ACT NO. (44): On or about November 14, 2017, A3 Consulting (WY-2017-000776260) listed: 1712 Pioneer Ave, Suite 500, Cheyenne, Wy 82001.

OVERT ACT NO. (45): On or about November 14, 2017, A3 Consulting (WY-2017-000776260) listed only ROBERT WILLIAMS as a board member.

OVERT ACT NO. (46): On or about October 23, 2018, A3 Consulting (WY-2017-000776260) submitted an annual filing.

OVERT ACT NO. (47): On or about October 23, 2018, annual business filing for A3 Consulting (WY-2017-000776260) listed ROBERT WILLIAMS as the sole officer (Treasurer).

OVERT ACT NO. (48): On or about October 23, 2018, annual business filing for A3 Consulting (WY-2017-000776260) used 1712 Pioneer Ave, Suite 500, Cheyenne, Wy 82001 as the corporate address.

OVERT ACT NO. (49): On or about December 27, 2018, A3 Consulting wired \$3,000,000 to Sean and Juliane McManus' 2018 Charitable Lead Annuity Trust (CLAT) account.

OVERT ACT NO. (50): On or about December 27, 2018, A3 Consulting wired \$1,200,000 to Jason and Sara Schrock's 2018 Charitable Lead Annuity Trust (CLAT) account controlled by JASON SCHROCK.

GLOBAL CONSULTING SERVICES:

OVERT ACT NO. (51): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Global Consulting Services.

OVERT ACT NO. (52): On or about and between January 1, 2017 and February 11, 2019, Global Consulting Services invoiced Charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles for a total of \$11,743,400.00.

CHARGES (cont'd)

OVERT ACT NO. (53): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK operated and controlled CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles at such time when they contracted with Global Consulting Services.

OVERT ACT NO. (54): On or about and between January 1, 2017 and February 11, 2019, Global Consulting Service's business bank account that received the paid portions of the invoices do not show business expenses sufficient to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (55): On or about November 7, 2016, JASON SCHROCK and SEAN MCMANUS registered Global Consulting Services, Inc. with the State of Wyoming as a for-profit corporation (2016-000731832) with the State of Wyoming.

OVERT ACT NO. (56): On or about November 7, 2016, JASON SCHROCK was listed as the President/SECRETARY of Global Consulting Services, Inc. on business filings with the State of Wyoming.

OVERT ACT NO. (57): On or about November 7, 2016, SEAN MCMANUS was listed as the CEO for the Global Consulting Services, Inc. on business filings with the State of Wyoming.

OVERT ACT NO. (58): On or about February 17, 2017, SEAN MCMANUS and JASON SCHROCK opened Farmers & Merchants bank account (270****4) for Global Consulting Services.

OVERT ACT NO. (59): On or about February 17, 2017, SEAN MCMANUS used the Wyoming address to open Farmers & Merchants bank account (270****4) for Global Consulting Services.

OVERT ACT NO. (60): On or about February 17, 2017, SEAN MCMANUS listed his employer as California Prep on bank filings to open Farmers & Merchants bank account (270****4) for Global Consulting Services.

OVERT ACT NO. (61): On or about February 17, 2017, JASON SCHROCK listed his employer as A3 Education on bank filings to open Farmers & Merchants bank account (270****4) for Global Consulting Services.

OVERT ACT NO. (62): On or about February 17, 2017, JASON SCHROCK filled out and signed a certification while opening Farmers & Merchants bank account (270****4) for Global Consulting Services stating they would not be conducting any business within the State of California.

OVERT ACT NO. (63): On or about February 17, 2017, JASON SCHROCK filled out and signed a certification while opening Farmers & Merchants bank account (270****4) stating Global Consulting Services is "closely related to our California Charter Schools."

OVERT ACT NO. (64): On or about September 19, 2017, Global Consulting Services (2016-000731832) submitted an annual filing to Wyoming as a for-profit company.

CHARGES (cont'd)

OVERT ACT NO. (65): On or about September 19, 2017, Global Consulting Services (2016-000731832) business filing listed JASON SCHROCK as he President/Director/Treasurer in the annual filing.

OVERT ACT NO. (66): On or about and between September 30, 2017 – February 8, 2019, Global Consulting Services contracted with California STEAM Sonoma II resulting in invoices totaling \$5,190,888.

OVERT ACT NO. (67): On or about October 23, 2018, Global Consulting Services (WY-2016-000731832) submitted an annual filing listing JASON SCHROCK as the sole officer.

OVERT ACT NO. (68): On or about October 23, 2018, business filing for Global Consulting Services (WY-2016-000731832) listed 1712 Pioneer Ave, Suite 500, Cheyenne, WY 82001 as its address.

OVERT ACT NO. (69): On or about October 23, 2018, business filing for Global Consulting Services (WY-2016-000731832) listed JASON SCHROCK was listed as the President/Director/Treasurer.

OVERT ACT NO. (70): On or about June 20, 2018, Global Consulting Services wired \$750,000 to the JASON SCHROCK.

OVERT ACT NO. (71): On or about June 21, 2018, Global Consulting Services wired \$750,000 to Juliane Spilker-McManus' National Australia Bank account who is the wife of SEAN MCMANUS.

OVERT ACT NO. (72): On or about November 16, 2018, Global Consulting Services wired \$1,000,000 to SEAN MCMANUS' National Australia Bank account.

OVERT ACT NO. (73): On or about November 16, 2018, Global Consulting Services wired \$200,000 to JASON SCHROCK.

OVERT ACT NO. (74): On or about December 3, 2018, Global Consulting Services wired \$500,000 to Jason and Sara Schrock's 2018 Charitable Lead Annuity Trust (CLAT) account controlled by JASON SCHROCK.

OVERT ACT NO. (75): On or about December 4, 2018, Global Consulting Services wired \$500,000 to JASON SCHROCK.

OVERT ACT NO. (76): On or about December 29, 2018, Global Consulting Services wired \$282,000 to the McManus 2017 Charitable Trust Account.

OVERT ACT NO. (77): On or about February 7, 2019, Global Consulting Services wired \$250,000 to Rowan Patrick McManus' National Australia Bank account.

MAD DOG MARKETING:

CHARGES (cont'd)

OVERT ACT NO. (78): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Mad Dog Marketing.

OVERT ACT NO. (79): On or about and between January 1, 2017 and February 11, 2019, Mad Dog Marketing invoiced charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma II, California Academy of Sports Science, Uplift North, Uplift Santa Barbara, Uplift South, University Prep, Uplift California Charter School, Valiant Prep Academy Southern California, Valiant Santa Barbara for a total of \$1,605,000.00.

OVERT ACT NO. (80): On or about and between January 1, 2017 to February 11, 2019, SEAN MCMANUS and JASON SCHROCK operated and controlled CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma II, California Academy of Sports Science, CSSB Uplift North, CSSB Uplift Santa Barbara, CSSB Uplift South, University Prep, Uplift California Charter School, Valiant Prep Academy Southern California, Valiant Santa Barbara at such time when they contracted with Mad Dog Marketing.

OVERT ACT NO. (81): On or about and between January 1, 2017 to February 11, 2019, Mad Dog Marketing's business bank account that received the paid portions of the invoices do not show business expenses sufficient to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (82): On or about November 14, 2017, Mad Dog Marketing (WY-2017-000776273) was registered as a for-profit corporation in the State of Wyoming.

OVERT ACT NO. (83): On or about November 14, 2017, business filing for Mad Dog Marketing listed 1712 Pioneer Ave, Suite 500, Cheyenne, Wy 8200 as its corporate address.

OVERT ACT NO. (84): On or about November 14, 2017, business filing for Mad Dog Marketing listed ROBERT WILLIAMS as a board member.

OVERT ACT NO. (85): On or about August 15, 2018, Sean McManus and Jason Schrock opened a Farmers and Merchants bank account (270****8) in the name of Mad Dog Marketing Inc.

OVERT ACT NO. (86): On or about August 17, 2018 Sean McManus and Jason Schrock signed and submitted a board resolution for Mad Dog Marketing Inc, in support of opening the Farmers and Merchants bank account (270****8).

OVERT ACT NO. (87): On or about August 13, 2018 Jason Schrock wrote, signed and submitted a letter to Farmers and Merchants bank, in support of opening the account (270****8) stating "This business is set up for operations outside of California and we would like to have this bank account opened as of 8-13-18". The letter listed Sean McManus and Jason Schrock on behalf of Mad Dog Marketing Inc.

CHARGES (cont'd)

OVERT ACT NO. (88): On or about August 14, 2018, Sean McManus signed and submitted nine (9) W9 forms for Mad Dog Marketing to charter school accounts within Bill.com for funding purposes. On or about October 23, 2018, Mad Dog Marketing INC, (WY-2017-000776273) submitted an annual filing for a for-profit corporation in the State of Wyoming.

OVERT ACT NO. (89): On or about October 23, 2018, business filing for Mad Dog Marketing INC, (WY-2017-000776273) listed 1712 Pioneer Ave, Suite 500, Cheyenne, Wy 82001 as its address.

OVERT ACT NO. (90): On or about October 23, 2018, business filing for Mad Dog Marketing INC, (WY-2017-000776273) listed ROBERT WILLIAMS as the only board member.

OVERT ACT NO. (91): On or about February 7, 2019, Mad Dog Marketing wired \$250,000 to Rowan Patrick McManus' National Australia Bank account.

AETERNO PARTNERS

OVERT ACT NO. (92): On or about and between October 7, 2016 to February 11, 2019, JASON SCHROCK and his wife owned Aeterno Partners, LLC.

OVERT ACT NO. (93): On or about October 7, 2016, JASON SCHROCK registered Aeterno Partners Group, Inc. (C3952491) with the State of California as a for-profit corporation.

OVERT ACT NO. (94): On or about October 27, 2016, Aeterno Partners Group (C3952491) filed an adjusted registration with the State of California as a non-profit with JASON SCHROCK adding his wife Sara Schrock and daughter Sophia Schrock to the registration.

OVERT ACT NO. (95): On or about January 26, 2017, JASON SCHROCK opened Farmers & Merchants bank account (270****7) for Aeterno Partners.

OVERT ACT NO. (96): On or about January 26, 2017, documents for Farmers & Merchants bank account (270****7) for Aeterno Partners listed JASON SCHROCK's employer as A3 Education.

OVERT ACT NO. (97): On or about August 10, 2017, Aeterno Partners Group (C3952491) submitted an annual filing with the State of California where JASON SCHROCK still used his personal address and listed himself as the CEO, and his wife Sara Schrock is listed as the CFO.

OVERT ACT NO. (98): On or about August 10, 2017, Aeterno Partners Group (C3952491) submitted an annual filing with the State of California where he added daughter, Sophia Schrock as the Secretary.

OVERT ACT NO. (99): On or about April 12, 2018, JASON SCHROCK emailed ROBERT WILLIAMS regarding his taxes for Aeterno Partners and indicated "all money in this account was first paid to Global Consulting Services, and transferred over the Aeterno Partners Group... It's simply a name on a bank account. (Please call to discuss)."

CHARGES (cont'd)

OVERT ACT NO. (100): On or about August 8, 2018, Viku Mehta submitted an annual business filing for Aeterno Partners Group, inc (C3952491).

OVERT ACT NO. (101): On or about August 8, 2018, annual business filing for Aeterno Partners Group removed JASON SCHROCK from the documents.

OVERT ACT NO. (102): On or about August 18, 2018, JASON SCHROCK, Sara Schrock, and Sophia Schrock are replaced on filings related to Aeterno Partners with Viku Mehta.

OVERT ACT NO. (103): On or about September 12, 2017, Global Consulting Services issued a check to Aeterno Partners, LLC for \$225,000.

OVERT ACT NO. (104): On or about December 6, 2017, Global Consulting Services transferred \$146,434.39 to Aeterno Partners, LLC.

OVERT ACT NO. (105): On or about March 6, 2018, Aeterno Partners, LLC wired \$35,000 to SSB Farms Inc.

OVERT ACT NO. (106): On or about March 7, 2018, Aeterno Partners, LLC wired \$125,000 to SSB Farms Inc. DALKIETH CONSULTING:

DALKIETH CONSULTING

OVERT ACT NO. (107): On or about and between November 10, 2015 to February 11, 2019, SEAN MCMANUS and his wife owned Dalkeith Consulting, LLC.

OVERT ACT NO. (108): On or about November 10, 2015, Dana Kislig, Esq. filed an annual statement of information for Dalkeith Consulting, LLC (2015-30010203).

OVERT ACT NO. (109): On or about November 10, 2015, business filing for Dalkeith Consulting LLC (2015-30010203) listed SEAN MCMANUS as the CEO and Manager of the LLC.

OVERT ACT NO. (110): On or about November 10, 2015, business filing for Dalkeith Consulting lists SEAN MCMANUS' personal address as the address for the company.

OVERT ACT NO. (111): November 6, 2017, Dalkeith Consulting, LLC (2015-30010203) submitted an annual updated LLC filing.

OVERT ACT NO. (112): On or about November 6, 2017, Dalkeith Consulting, LLC (2015-30010203) listed SEAN MCMANUS as the CEO, Manager and registered agent for the LLC.

OVERT ACT NO. (113): On or about November 6, 2017, Dalkeith Consulting, LLC (2015-30010203) business filing listed 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as the corporate address.

CHARGES (cont'd)

OVERT ACT NO. (114): On or about November 29, 2016, A3 Education issued a check to Dalkeith Consulting for \$175,000.

OVERT ACT NO. (115): On or about December 9, 2016, A3 Education issued a check to Dalkeith Consulting for \$13,000.

OVERT ACT NO. (116): On or about 21, 2016, Dalkeith Consulting wired \$235,000 to SEAN MCMANUS' National Australia Bank account.

OVERT ACT NO. (117): On or about May 30, 2017, A3 Education issued a check to Dalkeith Consulting for \$375,000.

CAL PREP SUTTER CHARTER SCHOOLS (K-7 / 8-12).

OVERT ACT NO. (118): On or about March 16, 2015, Elevate California C3625043 (aka: CA PREP Sutter Charter Schools) filed articles to change their name to The Preparatory & Flex Charter Academies of California listing SEAN MCMANUS as the Secretary.

OVERT ACT NO. (119): On or about March 16, 2015, Elevate California C3625043 (aka: CA PREP Sutter Charter Schools) filed articles to change their name to The Preparatory & Flex Charter Academies of California listing Rita Reese as the President.

OVERT ACT NO. (120): In or around July, 2015, SEAN MCMANUS and Rita Reese sought and obtained authorization for California Prep Sutter K-7 and California Prep Sutter 8-12 from the Meridian Elementary School District.

OVERT ACT NO. (121): On or about July 22, 2015, The Preparatory & Flex Charter Academies of California filed name change document to California Prep Sutter Charter Schools (C3625043) listing SEAN MCMANUS as the Secretary.

OVERT ACT NO. (122): On or about July 22, 2015, The Preparatory & Flex Charter Academies of California filed name change documents to California Prep Sutter Charter Schools (C3625043) listing Rita Reese as the President.

OVERT ACT NO. (123): On or about Sept, 15 2015, SEAN MCMANUS opened a bank account with California Credit Union in the name 'California Prep Sutter Charter Schools (account #709****8).

OVERT ACT NO. (124): On or about Sept, 15 2015, SEAN MCMANUS opened a second bank account with California Credit Union in the name 'California Prep Sutter Charter Schools (account #709****1).

OVERT ACT NO. (125): On or about October 20, 2015, SEAN MCMANUS opened a Farmers & Merchants bank account(270****), using his personal address as the company address while listing his employer as Cal Prep.

CHARGES (cont'd)

OVERT ACT NO. (126): On or about November 23, 2015 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal PREP Sutter K-7 certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (127): On or about January 1, 2016, SEAN MCMANUS opened up California Credit Union account #7094****1- California CA PREP Sutter Charter Schools using his personal address.

OVERT ACT NO. (128): On or about January 1, 2016, SEAN MCMANUS opened up California Credit Union account #7094****8- California CA PREP Sutter Charter Schools using his personal address.

OVERT ACT NO. (129): On or about January 29, 2016, Credit limits were increased for California Credit Union accounts #7094****1 and 7094****8 for California CA PREP Sutter Charter Schools which listed SEAN MCMANUS as administrator Secretary and JASON SCHROCK and Eric Johnson as board member.

OVERT ACT NO. (130): On or about June 30, 2016, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing JASON SCHROCK as a board member.

OVERT ACT NO. (131): On or about June 30, 2016, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing SEAN MCMANUS as CEO of the nonprofit corporation.

OVERT ACT NO. (132): On or about July 11, 2016, California Credit Union account #7094****1 - associated with California CA PREP Sutter Charter Schools and SEAN MCMANUS added ROBERT WILLIAMS as a new authorizer on the account.

OVERT ACT NO. (133): In or around December, 2017, Chris Thibodeau of Squar Milner, when conducting an annual independent audit of Cal Prep Sutter Charter Schools, expressed a concern about the Cal Prep Sutter Charter Schools relationship with A3 Education, Global Consulting Services and potential fraud.

OVERT ACT NO. (134): On or around December 12, 2017, around 10:55 p.m., in response to concerns from auditor Chris Thibodeau JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of Cal Prep Sutter Board Minutes from June 25, 2015, that did not state vendor contract for services were discussed at the meeting.

OVERT ACT NO. (135): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter K-7 and A3 Education.

OVERT ACT NO. (136): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter 8-12 and A3 Education.

OVERT ACT NO. (137): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter 8-12 and Global Consulting Services.

CHARGES (cont'd)

OVERT ACT NO. (138): On or about December 13, 2017, around 9:19 a.m., ROBERT WILLIAMS emailed Viku Meta and directed him to print out the documents provided by JASON SCHROCK on December 12, 2017.

OVERT ACT NO. (139): On or about December 13, 2017, around 9:39 a.m., ROBERT WILLIAMS forwarded concern expressed by Viku Meta to JASON SCHROCK that the Global Consulting services agreement pages were not legible.

OVERT ACT NO. (140): On or about December 13, 2017, around 9:40 a.m., ROBERT WILLIAMS emailed JASON SCHROCK "The minutes or agenda does not refer to approving A3 contract."

OVERT ACT NO. (141): On or about December 13, 2017, around 9:42 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "I'm on the road... can you have Viku make some changes that you need fixed?"

OVERT ACT NO. (142): On or about December 13, 2017, around 9:45 a.m., ROBERT WILLIAMS emailed JASON SCHROCK "No has to come from you without Viku his knowledge These are Board minutes."

OVERT ACT NO. (143): On or about December 13, 2017, around 10:02 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "I'll call you in a little bit what do you need change?"

OVERT ACT NO. (144): On or about December 13, 2017, around 10:03 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "Ok I will go back and fix them."

OVERT ACT NO. (145): On or about December 13, 2017 around 10:05 a.m., ROBERT WILLIAMS emailed JASON SCHROCK concerned that Schrock should not fabricate Board minutes for any meeting that Chris Thibodeau has access to the pre-existing minutes for, stating specifically "Problem is will they contradict anything they already have access to. Can't have two sets of minutes for a meeting."

OVERT ACT NO. (146): On or about December 13, 2017, around 10:30 a.m., JASON SCHROCK emailed ROBERT WILLIAMS new minutes for June 25, 2015, board minutes, now demonstrating that Vendor Contract for Services was approved by the Cal Prep Sutter Board via motion by Trustee Rita "Reece" whose actual name is Rita Reese.

OVERT ACT NO. (147): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of the June 25, 2015 Board minutes JASON SCHROCK revised.

OVERT ACT NO. (148): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of A3 Management Agreements with Cal Prep Sutter K-7 dated June 30, 2015 and electronically signed by "Rita Reece" who did not sign the documents and whose name is actually Rita Reese.

CHARGES (cont'd)

OVERT ACT NO. (149): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of A3 Management Agreements with Cal Prep Sutter 8-12 dated June 30, 2015 and electronically signed by "Rita Reece" who did not sign the documents and whose name is actually Rita Reese.

OVERT ACT NO. (150): On or about December 14, 2017, around 10:11 p.m. SEAN MCMANUS emailed JASON SCHROCK a letter of resignation from Cal Prep Sutter stating that he resigned from CAL PREP Sutter effective June 30, 2016.

OVERT ACT NO. (151): On or about December 14, 2017, around 10:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS with July 6, 2016 board meeting now demonstrating SEAN MCMANUS resigned from the charter school and ELI JOHNSON was promoted to the CEO.

OVERT ACT NO. (152): On or about December 15, 2017, around 2:34 p.m., JASON SCHROCK emailed Robert Sikma (Board President) ROBERT WILLIAMS, and SEAN MCMANUS "Please sign and send to the auditor. Eli... please make sure you read and are aware of this letter for us all to be on the same page and response should the auditor calls us again. Thank you sir!"

OVERT ACT NO. (153): On or about December 15, 2017, around 2:46 p.m., ROBERT WILLIAMS emailed JASON SCHROCK, "Did you make any changes? Did Eli read so he knows his responsibility when speaking to the auditor? Is it better to be in email form since the questions were email form. We don't want to elevate the correspondence to formal letters."

OVERT ACT NO. (154): On or about December 15, 2017, around 2:49 p.m., JASON SCHROCK emailed ROBERT WILLIAMS, Robert Sikma, SEAN MCMANUS, and ELI JOHNSON "I like the letter response."

OVERT ACT NO. (155): On or about December 15, 2017, around 3:03 p.m., ROBERT WILLIAMS emailed JASON SCHROCK, "Spoke to Rob You will respond to Chris's emails per an email and cc Eli on it. It will be done in 20 minutes."

OVERT ACT NO. (156): On or about December 15, 2017, around 3:56 p.m., ELI JOHNSON emailed ROBERT WILLIAMS, JASON SCHROCK, and Robert Sikma, "I have read and I am up to speed on the response from the board."

OVERT ACT NO. (157): On or about December 15, 2017, around 3:57 p.m., ELI JOHNSON emailed ROBERT WILLIAMS, JASON SCHROCK, and Robert Sikma "If Chris calls me I will let you know before calling him back."

OVERT ACT NO. (158): On or about December 15, 2017, around 3:57 p.m., SEAN MCMANUS emailed JASON SCHROCK, ELI JOHNSON, ROBERT WILLIAMS, and Robert Sikma, "Eli I think it would be best if you not speak to the auditor at this point, if he reaches out please contact Jason."

CHARGES (cont'd)

OVERT ACT NO. (159): On or about December 15, 2017, around 4:02 p.m., ELI JOHNSON emailed SEAN MCMANUS and ROBERT WILLIAMS, JASON SCHORK, and Robert Sikma, "Will do" taking a direct order from SEAN MCMANUS and demonstrating SEAN MCMANUS is the CEO of Cal Prep Sutter.

OVERT ACT NO. (160): On or about December 15, 2017, Robert Sikma emailed auditor Chris Thibodeau at the direction of SEAN MCMANUS, JASON SCHROCK, and ROBERT WILLIAMS that contained false statements meant to shield payments made to A3 Education and Global Consulting Services and the relationship between SEAN MCMANUS and Cal Prep Sutter Charter Schools.

OVERT ACT NO. (161): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "Mr. Eli Johnson is the CEO of California Prep Sutter" when ELI JOHNSON takes direct orders from SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (162): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "Within Eli's role as CEO, he is responsible for the review of the financial statements and audit information."

OVERT ACT NO. (163): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "All payments made to A3 and Global Consulting have been appropriately approved per the process mentioned above. The Memorandum of Understanding between A3 and the school and Global Consulting and the school have been reviewed and approved by the Board of Directors, see enclosed board minutes"

OVERT ACT NO. (164): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "The American Express card is in the name of SEAN MCMANUS. However, RICHARD NGUYEN, the business manager is in possession of this card and authorizes the purchases."

OVERT ACT NO. (165): On or about December 15, 2017 Robert Sikma forwarded his letter to auditor Chris Thibodeau to JASON SCHROCK, ROBERT WILLIAMS, and ELI JOHNSON and indicated he did so to ensure "we are all on the same page."

OVERT ACT NO. (166): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools dated June 30, 2017 based on documentation provided by SEAN MCMANUS, JASON SCHROCK, and/or their subordinates.

OVERT ACT NO. (167): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools and in the audit, reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (168): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing JASON SCHROCK as a board member.

OVERT ACT NO. (169): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing SEAN MCMANUS as CEO.

CHARGES (cont'd)

OVERT ACT NO. (170): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (171): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing ELI JOHNSON as the administrator of the school.

OVERT ACT NO. (172): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools identifying that the charter school engaged in related party transactions with SEAN MCMANUS.

OVERT ACT NO. (173): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter lacked internal controls because the school used check disbursements from "a signature of an individual that is not involved in management or the Board of Directors."

OVERT ACT NO. (174): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter did not provide evidence that journal entries and invoices were reviewed and authorized, as evidenced by initial or signature.

OVERT ACT NO. (175): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter did "not provide documentation to support several invoices and journal entries."

OVERT ACT NO. (176): On or about February 9, 2017 SEAN MCMANUS directed ROBERT WILLIAMS and Angela Slepak to submit Statements of Information for Cal Prep Sutter and put ELI JOHNSON as the CEO.

OVERT ACT NO. (177): On or about February 15, 2017, ROBERT WILLIAMS submitted an annual business filing for CA PREP Sutter Charter Schools (C3625043) listing ELI JOHNSON as the CEO/SECRETARY/CFO.

OVERT ACT NO. (178): On or about February 15, 2017, CA PREP Sutter Charter Schools (C3625043) current business filings no longer show SEAN MCMANUS as the registered agent.

OVERT ACT NO. (179): On or about May 24, 2017, Angela Slepak, emailed auditor Chris Thibodeau "on behalf ROBERT WILLIAMS" requesting revisions to the Cal Prep Sutter K-7 and Cal Prep Sutter 8-12 audit Statement of Functional Expenses to falsely claim payments to A3 Education and Dalkieth Consulting were for teacher salaries.

OVERT ACT NO. (180): On or about May 24, 2017, email from Angela Slepak requested to reallocate payments of \$122,005.544 from Cal Prep Sutter K-7 from A3 Education to Certificated Salaries under Education Program Services.

OVERT ACT NO. (181): On or about May 24, 2017, email from Angela Slepak requested to reallocate payments of \$18,750 from Cal prep Sutter K-7 to Dalkieth Consulting to Certificated Salaries under Education Program Services.

CHARGES (cont'd)

OVERT ACT NO. (182): On or about May 24, 2017, email from Angela Slepak requested to reallocate payments of \$119,314.64 from Cal Prep Sutter 8-12 from A3 Education to Certificated Salaries under Education Program Services.

OVERT ACT NO. (183): On or about May 24, 2017, email from Angela Slepak requested to reallocate payments of \$18,750 from Cal prep Sutter 8-12 to Dalkieth Consulting to Certificated Salaries under Education Program Services.

OVERT ACT NO. (184): On or about May 25, 2017, Chris Thibodeau provided revised audits to ROBERT WILLIAMS with payments to A3 Education and Dalkieth Consulting reflected as teacher salaries.

OVERT ACT NO. (185): On or about May 26, 2017, ROBERT WILLIAMS provided revised audits to SEAN MCMANUS stating "Pages that were changes is Audit report Date, page 13 note and functional expenses pages 21 and 22 Still waiting on Eli's [ELI JOHNSON] signature to submit and auditor will submit today or Tuesday."

OVERT ACT NO. (186): In or around December 2018, CA PREP Sutter Charter Schools hired Jeffrey Hill instead of SquarMilner to conduct its annual audit after Squar Milner found related party transactions, and findings related to improper invoicing and payments.

OVERT ACT NO. (187): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (188): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018, and in the audit reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (189): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018 listed ELI JOHNSON as administrator of the school instead of SEAN MCMANUS.

OVERT ACT NO. (190): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018 listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (191): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018 no longer listed JASON SCHROCK as a board member.

OVERT ACT NO. (192): On or about January 1, 2018, CA PREP SUTTER 8-12, CCU Account #709406381 began using 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as its address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (193): On or about August 17, 2018, Robert Williams submitted an annual business filing for CA PREP Sutter Charter Schools (C3625043) as the registered agent.

CHARGES (cont'd)

OVERT ACT NO. (194): On or about August 17, 2018, annual business filing for CA PREP Sutter Charter Schools (C3625043) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (195): On or about August 17, 2018, annual business filing for CA PREP Sutter Charter Schools (C3625043) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (196): In or around and between the November 2015 and April 30, 2019, ELI JOHNSON told Anne Sykes of Meridian Elementary School District that Cal Prep Sutter was the only charter school he worked with. CA STEAM SAN BERNARDINO:

OVERT ACT NO. (197): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM San Bernardino for \$12,830,203.

OVERT ACT NO. (198): Between January 1, 2017 to February 11, 2019, CA STEAM San Bernardino paid A3 Consulting \$1,626,208.

OVERT ACT NO. (199): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM San Bernardino for \$5,972,109.93.

OVERT ACT NO. (200): Between January 1, 2017 to February 11, 2019, CA STEAM San Bernardino paid A3 Education \$5,161,672.33.

OVERT ACT NO. (201): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM San Bernardino for \$1,902,088.

OVERT ACT NO. (202): Between January 1, 2017 to February 11, 2019, CA STEAM San Bernardino paid Global Consulting Services \$1,470,088.

OVERT ACT NO. (203): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM San Bernardino for \$300,000.

OVERT ACT NO. (204): Between January 1, 2017 to February 11, 2019, CA STEAM San Bernardino paid Mad Dog Marketing \$240,000.

OVERT ACT NO. (205): A management agreement exists between CA STEAM San Bernardino and A3 Education allegedly signed on October 25, 2015 signed by Marc Veldhuizen, JASON SCHROCK's brother in law, on behalf of A3, and Rob Sikma on behalf of CA STEAM San Bernardino.

OVERT ACT NO. (206): On or about and between January 2016 and August 2016, SEAN MCMANUS and ELI JOHNSON attended a Board meeting with the Trona Joint Unified School District to seek authorization from the District for CA STEAM San Bernardino.

CHARGES (cont'd)

OVERT ACT NO. (207): On or about March 11, 2016, SEAN MCMANUS registered a nonprofit corporation named California STEAM San Bernadino (C3884754) with the State of California.

OVERT ACT NO. (208): On or about July 1, 2016, ELI JOHNSON submitted a charter petition to and was granted authorization for CA STEAM San Bernardino by the Trona Joint Unified School District.

OVERT ACT NO. (209): On or about July 1, 2016, charter petition for CA STEAM San Bernardino listed ELI JOHNSON as lead petitioner and contact for the school to Trona Joint Unified School District.

OVERT ACT NO. (210): On or about July 27, 2016, SEAN MCMANUS and ELI JOHNSON opened Farmers & Merchants bank account (270****6) for CA STEAM San Bernardino.

OVERT ACT NO. (211): On or about July 27, 2016, Farmers & Merchants bank account (270****6) for CA STEAM San Bernardino used the address- 711 W. 17th St., Unit #E8, Costa Mesa, CA 92627.

OVERT ACT NO. (212): On or about July 27, 2016, Documents related to the Farmers & Merchants bank account (270****6) opened for CA STEAM San Bernardino, listed SEAN MCMANUS as an employee of California Prep.

OVERT ACT NO. (213): On or about July 27, 2016, Documents related to the Farmers & Merchants bank account (270****6) for CA STEAM San Bernardino, listed ELI JOHNSON as an employee of California Prep.

OVERT ACT NO. (214): On or about July 27, 2016, the CA STEAM San Bernadino Board authorized opening Farmers & Merchants bank account (270****6) and listed SEAN MCMANUS as the CEO/Secretary for the account.

OVERT ACT NO. (215): On or about July 27, 2016, the CA STEAM San Bernadino Board authorized opening Farmers & Merchants bank account (270****6) and listed ELI JOHNSON as an authorized signer for the account.

OVERT ACT NO. (216): On or about August 26, 2016, a 401k plan for CA STEAM San Bernardino listed SEAN MCMANUS as the President of CA STEAM San Bernardino.

OVERT ACT NO. (217): On or about September 15, 2016 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal STEAM San Bernardino certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (218): On or about October 5, 2016, Enriqueta Luquin (EDCBO) submitted an annual filing for California STEAM San Bernardino (C3884754) as a non-profit with the State of California, listing the charter's address as 711 17th st, Unit 8E, Costa Mesa, CA 92627.

OVERT ACT NO. (219): On or about October 5, 2016, California STEAM San Bernardino (C3884754) annual filing listed SEAN MCMANUS as the CEO/SECRETARY/CFO.

OVERT ACT NO. (220): On or about January 13, 2017, Damian Jenkins public profile was that of an employee of A3 Education performing accreditation services.

CHARGES (cont'd)

OVERT ACT NO. (221): On or about January 13, 2017, Damian Jenkins began being paid by CA STEAM San Bernardino for her services covering more than just CA STEAM San Bernardino.

OVERT ACT NO. (222): On or about and between January 13, 2017 and February 11, 2019, Damien Jenkins did not receive pay from A3 Education.

OVERT ACT NO. (223): On or about March 31, 2017, JUSTIN SCHMITT of A3 Education began getting paid out of CA STEAM San Bernardino accounts.

OVERT ACT NO. (224): On or about March 31, 2017, JUSTIN SCHMITT public profile was that of an employee of A3 Education working for multiple charter schools.

OVERT ACT NO. (225): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (226): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2017, and in the audit reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (227): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2017, reviewed and confirmed the school complied with attendance accounting laws.

OVERT ACT NO. (228): On or about December 8, 2017, Jeffrey Hill submitted an audit for CA STEAM San Bernardino dated June 30, 2017 and listed ELI JOHNSON as the Administrator of the school.

OVERT ACT NO. (229): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates

OVERT ACT NO. (230): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, and in the audit reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (231): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (232): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (233): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for CA STEAM San Bernardino (C3884754).

CHARGES (cont'd)

OVERT ACT NO. (234): On or about August 17, 2018, annual business filing for CA STEAM San Bernardino (C3884754) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (235): On or about August 17, 2018, annual business filing for CA STEAM San Bernardino (C3884754) listed Robert Williams as the registered agent.

OVERT ACT NO. (236): On or about August 17, 2018, annual business filing for CA STEAM San Bernardino (C3884754) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

CA STEAM SONOMA/II:

OVERT ACT NO. (237): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM Sonoma for \$5,190,888.

OVERT ACT NO. (238): Between January 1, 2017 to February 11, 2019, CA STEAM Sonoma paid Global Consulting Services \$3,820,219.

OVERT ACT NO. (239): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM Sonoma for \$165,000.

OVERT ACT NO. (240): Between January 1, 2017 to February 11, 2019, CA STEAM Sonoma paid Mad Dog Marketing \$165,000.

OVERT ACT NO. (241): On or about February 17, 2015, Juliane Spilker (Wife of SEAN MCMANUS) registered with the State of California as a non-profit corporation, Academies of Science, Technology, Engineering, Arts and Mathematics (Academies of STEAM) (C3757657) using her and SEAN MCMANUS' shared address.

OVERT ACT NO. (242): On or about November 23, 2015 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for CA STEAM Sonoma certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (243): On January 1, 2016, SEAN MCMANUS opened up a California Credit Union account #7094***for Academies of STEAM, using his personal address.

OVERT ACT NO. (244): A management agreement exists between CA STEAM Sonoma and A3 Education allegedly signed on February 1, 2016 signed by Marc Veldhuizen, JASON SCHROCK's brother in law, on behalf of A3, and Rob Sikma on behalf of CA STEAM Sonoma.

OVERT ACT NO. (245): On or about March 11, 2016, SEAN MCMANUS registered a nonprofit corporation named California STEAM Sonoma (C3884753) with the State of California.

CHARGES (cont'd)

OVERT ACT NO. (246): On or about March 11, 2016 CA STEAM Sonoma Bylaws designated A3 Education as its Sole Statutory Member.

OVERT ACT NO. (247): On or about March 17, 2016, ELI JOHNSON submitted a charter petition to and was granted authorization for CA STEAM Sonoma by Liberty School District.

OVERT ACT NO. (248): On or about July 18, 2016, SEAN MCMANUS was identified as the "President" of California STEAM Sonoma on the American Funds Record keeping service account for "California STEAM 401k".

OVERT ACT NO. (249): On or about July 22, 2016, SEAN MCMANUS opened California Credit Union bank account #7094****8 for CA STEAM Sonoma with the address being SEAN MCMANUS's personal address.

OVERT ACT NO. (250): On or about July 22, 2016, Board minutes for CA STEAM Sonoma (dated 07/23/2016) listed JASON SCHROCK as a board member.

OVERT ACT NO. (251): On or about January 31, 2017 ROBERT WILLIAMS submitted an annual business filing for ACADEMIES of Science, Technology, Engineering, Arts and Mathematics (Academies of STEAM) (C3757657).

OVERT ACT NO. (252): On or about January 31, 2017 annual business filing for (Academies of STEAM) (C3757657) listed SEAN MCMANUS as the registered agent, CEO/SECRETARY/CFO.

OVERT ACT NO. (253): On or about February 15, 2017, Academies of STEAM (C3757657) business filing listed ELI JOHNSON instead of SEAN MCMANUS as the CEO/SECRETARY/CFO.

OVERT ACT NO. (254): On or about February 15, 2017, the Academies of STEAM (C3757657) address used remained 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (255): On or about February 15, 2017, CA STEAM Sonoma (C3884753) submitted the annual non-profit business filing listing ELI JOHNSON as the CEO/SECRETARY/CFO.

OVERT ACT NO. (256): On or about February 15, 2017, CA STEAM Sonoma (C3884753) removed SEAN MCMANUS as the registered agent.

OVERT ACT NO. (257): On or about February 15, 2017, CA STEAM Sonoma (C3884753) address remained 3300 Irvine Ave, Suite #330, Newport Beach, CA 92660, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (258): On or about April 10, 2017, ELI JOHNSON submitted and was approved a charter petition for CA STEAM SONOMA II by Guerneville Elementary School District.

OVERT ACT NO. (259): On or about April 10, 2017, charter petition for CA STEAM Sonoma II ELI JOHNSON as lead petitioner and contact for the school to Guerneville Elementary School District.

CHARGES (cont'd)

OVERT ACT NO. (260): On or about April 10, 2017, charter petition for CA STEAM Sonoma II listed Luiz Rigney, C Ceriman, ROBERT WILLIAMS, Eric Johnson, Darrin Erb and JASON SCHROCK as founding board members.

OVERT ACT NO. (261): On or about April 10, 2017, charter petition for CA STEAM Sonoma II included Articles of Incorporation for the Academies of STEAM (C3757657), which was opened by SEAN MCMANUS' wife Julian Spilker McManus (in her maiden name).

OVERT ACT NO. (262): On or about June 16, 2017, EDCBO entered into a services agreement with CA STEAM SONOMA II (C3884753) listing ELI JOHNSON as the School contact.

OVERT ACT NO. (263): On or around October 23, 2017, Liberty Elementary School District issued a Notice of Violation for CA STEAM Sonoma addressed to ELI JOHNSON.

OVERT ACT NO. (264): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma failed to meet generally accepted accounting principles when it overstated revenue by over a million dollars without explanation.

OVERT ACT NO. (265): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma "failed to provide the District with detailed attendance report."

OVERT ACT NO. (266): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma violated the Brown Act.

OVERT ACT NO. (267): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma violated the Brown Act.

OVERT ACT NO. (268): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma violated the Individuals with Disabilities Education Act.

OVERT ACT NO. (269): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma violated the terms and conditions of its charter.

OVERT ACT NO. (270): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (271): On or about December 8, 2017, Jeffery Hill was not provided the Notice of Violation from CA STEAM Sonoma I prior to completing the annual audit for CA STEAM SONOMA dated June 30, 2017.

CHARGES (cont'd)

OVERT ACT NO. (272): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (273): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with attendance accounting laws

OVERT ACT NO. (274): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, listed Robert Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (275): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, listed ELI JOHNSON as the Administrator of the school.

OVERT ACT NO. (276): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, listed ROBERT WILLIAMS as the CBO of the school.

OVERT ACT NO. (277): On or about January 19, 2018, CA STEAM SONOMA voluntarily closed in lieu of having their charter revoked by Liberty School District due to fiscal mismanagement and charter violations.

OVERT ACT NO. (278): On or about March 12, 2018, bank documents opening the California Credit Union bank account (#1193****4) for CA STEAM SONOMA listed 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as the corporate address CA STEAM Sonoma which is the address of Charter School Financial Systems, LLC and Williams

Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (279): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (280): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018 and in the audit, reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (281): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018 and in the audit found that CA STEAM Sonoma was not allowed to claim full attendance because it voluntarily closed in the middle of the school year and did not offer a full school years worth of education.

OVERT ACT NO. (282): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018 listed ELI JOHNSON as the administrator.

CHARGES (cont'd)

OVERT ACT NO. (283): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018 listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (284): On or about December 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma II dated June 30, 2018, and in the audit, reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (285): On or about December 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma II dated June 30, 2018, listed ELI JOHNSON as the administrator.

OVERT ACT NO. (286): On or about December 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma II dated June 30, 2018, listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (287): On or about and between July 1, 2018 – November 21, 2018, Mad Dog Marketing contracted with California STEAM Sonoma II resulting in invoices totaling \$165,000.

OVERT ACT NO. (288): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for CA STEAM Sonoma (C3884753).

OVERT ACT NO. (289): On or about August 17, 2018, annual business filing for CA STEAM Sonoma (C3884753) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (290): On or about August 17, 2018, annual business filing for CA STEAM Sonoma (C3884753) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (291): On or about August 31, 2018, Klarc Korver earned \$12,400.00 from Ca STEAM Sonoma. CA STEAM SANTA BARBARA:

OVERT ACT NO. (292): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM Santa Barbara for \$2,487,127.

OVERT ACT NO. (293): Between January 1, 2017 to February 11, 2019, CA STEAM Santa Barbara paid A3 Consulting \$516,761.

OVERT ACT NO. (294): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM Santa Barbara for \$1,718,786.31.

OVERT ACT NO. (295): Between January 1, 2017 to February 11, 2019, CA STEAM Santa Barbara paid A3 Education \$1,718,786.31.

OVERT ACT NO. (296): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM Santa Barbara for \$476,376.

CHARGES (cont'd)

OVERT ACT NO. (297): Between January 1, 2017 to February 11, 2019, CA STEAM Santa Barbara paid Global Consulting Services \$217,176.

OVERT ACT NO. (298): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA CA STEAM Santa Barbara for \$60,000.

OVERT ACT NO. (299): Between January 1, 2017 to February 11, 2019, CA STEAM Santa Barbara paid Mad Dog Marketing \$48,000.

OVERT ACT NO. (300): A management agreement exists between CA STEAM Santa Barbara and A3 Education allegedly signed on June 7, 2016 signed by Marc Veldhuizen, JASON SCHROCK's brother in law, on behalf of A3, and Rob Sikma on behalf of CA STEAM Santa Barbara.

OVERT ACT NO. (301): On or about July 1, 2016, ELI JOHNSON submitted a charter petition for CA STEAM Santa Barbara to the Cuyama Joint Unified School District and was granted authorization.

OVERT ACT NO. (302): On or about July 1, 2016, charter petition for CA STEAM Santa Barbara listed ELI JOHNSON as contact for the school to Cuyama Joint Unified School District.

OVERT ACT NO. (303): On or about July 1, 2016, charter petition for CA STEAM Santa Barbara listed C Ceriman, ROBERT WILLIAMS, Eric Johnson, Darrin Erb, Caroline Nuttall and JASON SCHROCK as the founding board members.

OVERT ACT NO. (304): On or about July 24, 2016, an EDCBO service agreement put in place with CA STEAM SANTA BARBARA for 3% of School revenue listed ELI JOHNSON as the school contact.

OVERT ACT NO. (305): On or about September 15, 2016 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal STEAM Santa Barbara certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (306): On or about 13, 2016, JASON SCHROCK registered CA STEAM Santa Barbara (C3953916) with the State of California as a non-profit corporation.

OVERT ACT NO. (307): On or about 13, 2016 JASON SCHROCK registered CA STEAM Santa Barbara (C3953916) using his personal address.

OVERT ACT NO. (308): On or about 20, 2016, SEAN MCMANUS opened California Credit Union bank account #7094****5 for CA STEAM Santa Barbara (C3953916).

OVERT ACT NO. (309): On or about 20, 2016, SEAN MCMANUS used 711 17th St, 8E, Costa Mesa, CA 92627 as the address c/o ACS Accountancy Corp 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 to open California Credit Union bank account #7094****5 for CA STEAM Santa Barbara which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

CHARGES (cont'd)

OVERT ACT NO. (310): On or about October 24, 2016, SEAN MCMANUS filed an addendum to California Credit Union bank account #7094****5 for CA STEAM Santa Barbara adding authorized signers.

OVERT ACT NO. (311): On or about October 24, 2016, California Credit Union bank account #7094****5 filing by SEAN MCMANUS added ROBERT WILLIAMS as authorized user for CA STEAM Santa Barbara bank account.

OVERT ACT NO. (312): On or about June 13, 2017, CA STEAM Santa Barbara (C3953915) submitted an annual filing as a non-profit listing ELI JOHNSON as the registered agent for the corporation.

OVERT ACT NO. (313): On or about June 13, 2017, CA STEAM Santa Barbara (C3953915) replaced JASON SCHROCK as registered agent with ELI JOHNSON.

OVERT ACT NO. (314): On or about June 13, 2017, despite changing agents CA STEAM Santa Barbara (C3953915) used the same address of 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 on its business filing which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (315): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (316): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (317): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with attendance accounting laws.

OVERT ACT NO. (318): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, listed Robert Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (319): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, listed ELI JOHNSON as the Superintendent of the school.

OVERT ACT NO. (320): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (321): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018, and in the audit, reviewed compliance with funding determinations and attendance.

CHARGES (cont'd)

OVERT ACT NO. (322): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018, the annual audit for CA STEAM Santa Barbara and listed ELI JOHNSON as the administrator of the school.

OVERT ACT NO. (323): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018 and listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (324): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for CA STEAM Santa Barbara (C3953916).

OVERT ACT NO. (325): On or about August 17, 2018, annual business filing for CA STEAM Santa Barbara (C3953916) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (326): On or about August 17, 2018, annual business filing for CA STEAM Santa Barbara (C3953916) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

VALIANT ACADEMY SOUTHERN CALIFORNIA:

OVERT ACT NO. (327): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Prep Southern California for \$4,155,917.

OVERT ACT NO. (328): Between January 1, 2017 to February 11, 2019, Valiant Prep Southern California (which is controlled by SEAN MCMANUS and JASON SCHROCK) paid A3 Consulting \$4,155,917.

OVERT ACT NO. (329): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Prep Southern California for \$4,854,955.04.

OVERT ACT NO. (330): Between January 1, 2017 to February 11, 2019, Valiant Prep Southern California paid A3 Education \$4,854,955.04.

OVERT ACT NO. (331): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Prep Southern California for \$1,207,816.

OVERT ACT NO. (332): Between January 1, 2017 to February 11, 2019, Valiant Prep Southern California paid Global Consulting Services \$1,207,816.

OVERT ACT NO. (333): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Valiant Prep Southern California for \$360,000.

OVERT ACT NO. (334): Between January 1, 2017 to February 11, 2019, Valiant Prep Southern California paid Mad Dog Marketing \$360,000.

CHARGES (cont'd)

OVERT ACT NO. (335): In or around November 2016, JASON SCHROCK and SEAN MCMANUS, through the corporation Academics, Arts and Action Charter Academy (A3 Education), purchased from Foundation Learning LLC the rights to manage, operate, and collect public funds from Mosaica Online Academy of Southern California authorized by Dehesa Elementary School District.

OVERT ACT NO. (336): In or around November 2016, Steve Van Zant (owner of Ed Collective and EDCBO) brokered the deal between A3 Education and Foundation Learning LLC to purchase the rights to manage, operate, and collect public funds from Mosaica Online Academy of Southern California.

OVERT ACT NO. (337): In or around November 2016, Steve Van Zant (owner of Ed Collective and EDCBO) contracted to receive 3% of the purchase price (\$1.5 Million) for A3 Education's purchase of Mosaica Academy of Southern California from Foundation Learning LLC.

OVERT ACT NO. (338): On or about May 2, 2017, Education Collective (ED COLLECTIVE) a Steven Van Zant owned company, contracted with Jason Schrock and Valiant Academy Charter School- San Diego, to provide 'consulting' services for 3% of the school's annual state funding.

OVERT ACT NO. (339): In or around November 2016, JASON SCHROCK was listed as the President of A3 Foundation (CA) on the contract for purchase of the Mosaica Online Academy of Southern California.

OVERT ACT NO. (340): On or about December 5, 2016, JASON SCHROCK registered Online of Southern California (aka: Valiant Academy San Diego) with the State of California as a non-profit corporation (C3966287).

OVERT ACT NO. (341): On or about February 15, 2017, JASON SCHROCK filed and updated business filing for Online Academy of Southern California (C3966287) as a non-profit corporation within the State of California.

OVERT ACT NO. (342): On or about February 15, 2017, Mosaica Online Academy of Southern California (C3216022), and Online of Southern California (C3966287) filed its merger with the State of California signed by ROBERT WILLIAMS as a Board Member

OVERT ACT NO. (343): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (344): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (345): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with attendance accounting laws.

CHARGES (cont'd)

OVERT ACT NO. (346): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017 listed Robert Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (347): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017 listed JASON SCHROCK as the President of the school.

OVERT ACT NO. (348): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017 listed JUSTIN SCHMITT as the Director of the school.

OVERT ACT NO. (349): On or about September 8, 2017, JASON SCHROCK, as registered agent, submitted an updated business filing for Valiant Academy of San Diego (C3966287) with the name Valiant Academy of San Diego.

OVERT ACT NO. (350): On or about September 8, 2017, Valiant Academy of San Diego (C3966287) business filing listed JASON SCHROCK as the CFO.

OVERT ACT NO. (351): On or about September 8, 2017, Valiant Academy of San Diego (C3966287) business filing listed Robert Sikma as the CEO, and Klarc Korver as the SECRETARY.

OVERT ACT NO. (352): On or about September 8, 2017, Valiant Academy of San Diego (C3966287) business filing used 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the address, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (353): On or about September 25, 2017, JASON SCHROCK opened Farmers & Merchants bank account (270****7) 2017 for Valiant Academy of San Diego using the address-3300 Irvine Ave, Suite 330, Newport Beach, Ca 92660.

OVERT ACT NO. (354): On or about September 25, 2017, documents for Farmers & Merchants bank account (270****7) for Valiant Academy of San Diego documents listed JASON SCHROCK as an employee of A3 Education.

OVERT ACT NO. (355): On or about September 25, 2017, documents for Farmers & Merchants bank account (270****7) for Valiant Academy of San Diego documents listed ELI JOHNSON as the co-authorized user.

OVERT ACT NO. (356): On or about September 25, 2017, documents for Farmers & Merchants bank account (270****7) for Valiant Academy of San Diego documents listed ELI JOHNSON'S employer as California Prep.

OVERT ACT NO. (357): On or about September 25, 2017, Valiant Academy of San Diego approved a resolution authorizing opening Farmers & Merchants bank account (270****7) for Valiant Academy of San Diego and listed JASON SCHROCK as the officer and ELI JOHNSON as an authorized signer.

OVERT ACT NO. (358): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for Valiant Academy San Diego (C3966287) as the registered agent.

CHARGES (cont'd)

OVERT ACT NO. (359): On or about August 17, 2018, annual business filing for Valiant Academy San Diego (C3966287) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (360): On or about August 17, 2018, annual business filing for Valiant Academy San Diego (C3966287) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

VALIANT ACADEMY LOS ANGELES:

OVERT ACT NO. (361): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Academy Los Angeles for \$4,325,707.

OVERT ACT NO. (362): Between January 1, 2017 to February 11, 2019, Valiant Academy Los Angeles paid A3 Consulting \$2,834,915.

OVERT ACT NO. (363): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Academy Los Angeles for \$9,692,837.

OVERT ACT NO. (364): Between January 1, 2017 to February 11, 2019, Valiant Academy Los Angeles paid A3 Education \$8,960,212.94.

OVERT ACT NO. (365): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Academy Los Angeles for \$1,038,880.

OVERT ACT NO. (366): Between January 1, 2017 to February 11, 2019, Valiant Academy Los Angeles paid Global Consulting Services \$1,038,880.

OVERT ACT NO. (367): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Valiant Academy Los Angeles for \$315,000.

OVERT ACT NO. (368): Between January 1, 2017 to February 11, 2019, Valiant Academy Los Angeles paid Mad Dog Marketing \$315,000.

OVERT ACT NO. (369): On or about October 27, 2016 JASON SCHROCK was listed as COO of Valiant Academy Los Angeles in an agreement with Ed Collective, LLC for services.

OVERT ACT NO. (370): In or around November 2016, JASON SCHROCK and SEAN MCMANUS, through the corporation Academics, Arts and Action Charter Academy, purchased from Foundation Learning LLC the rights to manage, operate, and collect public funds from Mosaica Online Academy of Los Angeles authorized by Acton Agua Dulce Unified School District.

CHARGES (cont'd)

OVERT ACT NO. (371): In or around November 2016, Steve Van Zant (owner of Ed Collective and EDCBO) brokered the deal between A3 Education and Foundation Learning LLC to purchase the rights to manage, operate, and collect public funds from Mosaica Online Academy of Los Angeles.

OVERT ACT NO. (372): In or around November 2016, Steve Van Zant (owner of Ed Collective and EDCBO) contracted to receive 3% of the purchase price (\$1.5 Million) for A3 Education's purchase of Mosaica Academy of Los Angeles from Foundation Learning LLC.

OVERT ACT NO. (373): On or about May 2, 2017, Education Collective (ED COLLECTIVE) a Steven Van Zant owned company, contracted with Jason Schrock and Valiant Academy Charter School, to provide 'consulting' services for 3% of the school's annual state funding

OVERT ACT NO. (374): In or around November 2016, JASON SCHROCK was listed as the President of A3 Foundation (CA) on the contract for purchase of the Mosaica Online Academy of Los Angeles.

OVERT ACT NO. (375): On or about December 5, 2016, JASON SCHROCK registered Online Academy of Los Angeles (aka: Valiant Academy of Los Angeles) with the State of California as a non-profit corporation (C3966286).

OVERT ACT NO. (376): On or about February 15, 2017, JASON SCHROCK submitted a business filing for Online Academy of Los Angeles (C3966286) as a non-profit corporation within the State of California.

OVERT ACT NO. (377): On or about February 15, 2017, Mosaica Online Academy of Los Angeles (C3694447), and Online Academy of Los Angeles (C3966286) filed its merger with the State of California signed by ROBERT WILLIAMS as a Board Member.

OVERT ACT NO. (378): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 based on information provided to him by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (379): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (380): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with attendance accounting laws.

OVERT ACT NO. (381): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 and listed Robert Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (382): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 and listed JASON SCHROCK as the President of the school.

CHARGES (cont'd)

OVERT ACT NO. (383): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 and listed JUSTIN SCHMITT as the Director of the school.

OVERT ACT NO. (384): On or about July 24, 2017, to June 8, 2018, Global Consulting Services contracted with Valiant Academy of Los Angeles resulting in invoices totaling \$1,038,880.

OVERT ACT NO. (385): On or about August 2, 2017, Online Academy of Los Angeles (C3966286) changed its name to Valiant Academy LA.

OVERT ACT NO. (386): On or about August 10, 2017, Online Academy of Los Angeles filed a name change with the State of California to become Valiant Academy of LA.

OVERT ACT NO. (387): On or about August 10, 2017, articles of incorporation showing name change from Online Academy of Los Angeles to Valiant Academy of LA indicate Robert Sikma and Klarc Korver were board members.

OVERT ACT NO. (388): On or about August 21, 2017, JASON SCHROCK opened Farmers & Merchants bank account (270****2) for Online Academy of Los Angeles.

OVERT ACT NO. (389): On or about August 21, 2017, JASON SCHROCK listed his employer as A3 Education on documents to open Farmers & Merchants bank account (270****2) for Online Academy of Los Angeles.

OVERT ACT NO. (390): On or about August 21, 2017, ELI JOHNSON was listed as the co-authorized user on Farmers & Merchants bank account (270****2) for Online Academy of Los Angeles.

OVERT ACT NO. (391): On or about August 21, 2017, Online Academy of Los Angeles Board approved a resolution authorizing opening a Farmers & Merchants bank account (270****2) for Online Academy of Los Angeles and listed JASON SCHROCK as the President/CEO.

OVERT ACT NO. (392): On or about August 21, 2017, Online Academy of Los Angeles Board approved a resolution authorizing opening a Farmers & Merchants bank account (270****2) for Online Academy of Los Angeles and listed ELI JOHNSON as an authorized signer for both Online Academy of Los Angeles and for the account.

OVERT ACT NO. (393): On or about August 21, 2017, a power of attorney declaration was filed with South Carolina Dept. of Revenue on behalf of Online Academy of Los Angeles which identified JASON SCHROCK as the president of Online Academy of Los Angeles.

OVERT ACT NO. (394): On or about September 8, 2017, Valiant Academy of LA (C3966286) submitted an annual business filing with the name Valiant Academy of LA.

OVERT ACT NO. (395): On or about September 8, 2017, Valiant Academy of LA (C3966286) business filing listed JASON SCHROCK as the CFO.

CHARGES (cont'd)

OVERT ACT NO. (396): On or about September 8, 2017, Valiant Academy of LA (C3966286) business filing listed Robert Sikma as the CEO, Klarc Korver as the SECRETARY.

OVERT ACT NO. (397): On or about September 8, 2017, Valiant Academy of LA (C3966286) business filing used 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (398): On or about and between September 30, 2017, - December 19, 2018, Mad Dog Marketing contracted with Valiant Academy of Los Angeles resulting in invoices of \$315,000.

OVERT ACT NO. (399): On or about and between September 30, 2017, - February 8, 2019, A3 Consulting contracted with Valiant Academy of Los Angeles resulting in invoices totaling \$4,325,707.

OVERT ACT NO. (400): On or about October 19, 2017, JASON SCHROCK changed the name of Farmers & Merchants bank account (270****2) from Online Academy of Los Angeles to Valiant Academy of Los Angeles.

OVERT ACT NO. (401): On or about October 19, 2017, JASON SCHROCK listed his employer as A3 Education on Farmers & Merchants bank account (270****2) for Valiant Academy Los Angeles.

OVERT ACT NO. (402): On or about October 19, 2017, bank documents show Farmers & Merchants bank account (270****2) for Valiant Academy Los Angeles continued to use the address-3300 Irvine Ave, Suite 330, Newport Beach, Ca 92660.

OVERT ACT NO. (403): On or about October 19, 2017, bank documents show ELI JOHNSON was the co-authorized user of Farmers & Merchants bank account (270****2) for Valiant Academy Los Angeles.

OVERT ACT NO. (404): On or about October 19, 2017, bank documents indicate ELI JOHNSON's employer was California Prep.

OVERT ACT NO. (405): On or about October 19, 2017, the Valiant Academy of Los Angeles Board approved a resolution related to Farmers & Merchants bank account (270****2) listing JASON SCHROCK as the officer of the corporation.

OVERT ACT NO. (406): On or about October 19, 2017, the Valiant Academy of Los Angeles Board approved a resolution related to Farmers & Merchants bank account (270****2) listing ELI JOHNSON as an authorized signer.

OVERT ACT NO. (407): On or about October 19, 2017, documents for Farmers & Merchants bank account (270****2) for Valiant Preparatory Academy LA list Robert Sikma as the CEO and Klarc Korver as the Secretary for Valiant Academy Los Angeles.

OVERT ACT NO. (408): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for Valiant Academy LA (C3966286).

CHARGES (cont'd)

OVERT ACT NO. (409): On or about August 17, 2018, annual business filing for Valiant Academy LA (C3966286) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (410): On or about August 17, 2018, annual business filing for Valiant Academy LA (C3966286) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

VALIANT ACADEMY SANTA BARBARA:

OVERT ACT NO. (411): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Santa Barbara for \$1,972,427.

OVERT ACT NO. (412): Between January 1, 2017 to February 11, 2019, Valiant Santa Barbara paid A3 Consulting \$530,083.

OVERT ACT NO. (413): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Santa Barbara for \$472,769.

OVERT ACT NO. (414): Between January 1, 2017 to February 11, 2019, Valiant Santa Barbara paid A3 Education \$472,769.

OVERT ACT NO. (415): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Santa Barbara for \$79,950.

OVERT ACT NO. (416): Between January 1, 2017 to February 11, 2019, Valiant Santa Barbara paid Global Consulting Services \$79,950.

OVERT ACT NO. (417): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Valiant Santa Barbara for \$45,000.

OVERT ACT NO. (418): Between January 1, 2017 to February 11, 2019, Valiant Santa Barbara paid Mad Dog Marketing \$45,000.

OVERT ACT NO. (419): On or about July 1, 2017, ELI JOHNSON submitted a charter petition to and was granted authorization for Valiant Santa Barbara by Cuyama Joint Unified School District.

OVERT ACT NO. (420): On or about July 1, 2017, charter petition for Valiant Santa Barbara listed ELI JOHNSON as lead petitioner and contact for the school with Cuyama Joint Unified School District.

OVERT ACT NO. (421): On or about October 27, 2017, JASON SCHROCK and ELI JOHNSON opened Farmers & Merchants bank account (270****1) for Valiant Academy Santa Barbara.

CHARGES (cont'd)

OVERT ACT NO. (422): On or about October 27, 2017, bank documents for Farmers & Merchants bank account (270****1) for Valiant Academy Santa Barbara listed 3300 Irvine Ave, Suite 330, Newport Beach, Ca 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (423): On or about October 27, 2017, JASON SCHROCK listed A3 Education as his employer on Farmers & Merchants bank account (270****1) for Valiant Academy Santa Barbara.

OVERT ACT NO. (424): On or about October 27, 2017, bank documents for Farmers & Merchants bank account (270****1) for Valiant Academy Santa Barbara listed ELI JOHNSON's employer as California Prep.

OVERT ACT NO. (425): On or about October 27, 2017, the Valiant Academy LA board approved a resolution authorizing opening Farmers & Merchants bank account's (270****1) for Valiant Academy Santa Barbara, which listed JASON SCHROCK as an Officer of the Corporation.

OVERT ACT NO. (426): On or about October 27, 2017, the Valiant Academy LA board approved a resolution authorizing opening Farmers & Merchants bank account's (270****1) for Valiant Academy Santa Barbara, which listed ELI JOHNSON as an authorized signer on the account.

OVERT ACT NO. (427): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (428): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018 and in the audit, reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (429): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018 and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (430): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018, the annual audit for Valiant Santa Barbara listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

UPLIFT CALIFORNIA (MONTEREY):

OVERT ACT NO. (431): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift California for \$2,216,054.

OVERT ACT NO. (432): Between January 1, 2017 to February 11, 2019, Uplift California paid A3 Consulting \$2,216,054.

OVERT ACT NO. (433): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift California for \$2,568,029.03.

CHARGES (cont'd)

OVERT ACT NO. (434): Between January 1, 2017 to February 11, 2019, Uplift California paid A3 Education \$2,073,029.03.

OVERT ACT NO. (435): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift California for \$286,290.

OVERT ACT NO. (436): Between January 1, 2017 to February 11, 2019, Uplift California paid Global Consulting Services \$286,290.

OVERT ACT NO. (437): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Uplift California for \$120,000.

OVERT ACT NO. (438): Between January 1, 2017 to February 11, 2019, Uplift California paid Mad Dog Marketing \$120,000.

OVERT ACT NO. (439): A management agreement exists between Uplift California (Monterey) and A3 Education allegedly signed on June 7, 2016 by Rob Sikma on behalf of Uplift California (Monterey)

OVERT ACT NO. (440): On or about July 24, 2016, an EDCBO service agreement put in place with CA STEAM Charter School Monterey County lists ELI JOHNSON as the School contact.

OVERT ACT NO. (441): On or about July 25, 2016, SEAN MCMANUS directed Luis Rigney to fill out paperwork to register UPLIFT California Charter Schools (C3930004) as a non-profit corporation in the State of California and claim he is the chief officer of Uplift California Charter Schools.

OVERT ACT NO. (442): On or about August 23, 2016, at the direction of SEAN MCMANUS, Luis Rigney submitted a charter petition to and was granted authorization for UPLIFT California Monterey Charter School by Bradley Union School.

OVERT ACT NO. (443): On or about August 23, 2016, charter petition for UPLIFT Monterey Charter School listed C Ceriman, Robert Williams, Eric Johnson, Darrin Erb, Caroline Nuttall and JASON SCHROCK as board members for the charter.

OVERT ACT NO. (444): On or about July 24, 2016, an EDCBO service agreement put in place with CA STEAM Charter School Monterey County lists ELI JOHNSON as the School contact.

OVERT ACT NO. (445): On or about February 14, 2017, SEAN MCMANUS filed a registration form for Commercial Employers with CA Employment Development Department on behalf of Uplift California Charter Schools listing himself as the CEO.

OVERT ACT NO. (446): On or about February 14, 2017, SEAN MCMANUS filed a registration form for Commercial Employers with CA Employment Development Department on behalf of Uplift California Charter Schools listing JASON SCHROCK's address as the Physical location of the charter.

CHARGES (cont'd)

OVERT ACT NO. (447): On or about March 8, 2017, ROBERT WILLIAMS filed an annual business filing for UPLIFT CA Charter Schools (C3930004).

OVERT ACT NO. (448): On or about March 8, 2017, business filing for UPLIFT CA Charter Schools (C3930004) lists ELI JOHNSON as the CEO/SECRETARY/CFO.

OVERT ACT NO. (449): On or about March 8, 2017, business filing for UPLIFT CA Charter Schools (C3930004) lists address of the charter school at 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660.

OVERT ACT NO. (450): On or about and between May 2, 2017, – May 4, 2018, A3 Education contracted with Uplift Monterey resulting in invoices totaling \$2,568,029.

OVERT ACT NO. (451): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (452): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (453): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with attendance accounting laws.

OVERT ACT NO. (454): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017, and listed Robert Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (455): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017 and listed ELI JOHNSON as the Superintendent of the school.

OVERT ACT NO. (456): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017 and listed Luis Rigney as the Principal of the school.

OVERT ACT NO. (457): On or about September 26, 2017, SEAN MCMANUS signed contract between EDCBO and UPLIFT SCHOOLS- Monterey County (UPLIFT North, UPLIFT South, UPLIFT Monterey) on behalf of UPLIFT Schools.

OVERT ACT NO. (458): On or about September 26, 2017, EDCBO signed a service contract with UPLIFT SCHOOLS- Monterey County (UPLIFT North, UPLIFT South, UPLIFT Monterey) listed ELI JOHNSON as the School contact.

OVERT ACT NO. (459): On or about October 26, 2017, SEAN MCMANUS and ELI JOHNSON opened Farmers & Merchants bank account (270****5) for California STEAM San Bernardino/ Uplift California.

CHARGES (cont'd)

OVERT ACT NO. (460): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****5) for California STEAM San Bernardino/ Uplift California used the address-711 17th St, Unit 8E, Costa Mesa, CA 92627 to open.

OVERT ACT NO. (461): On or about October 26, 2017, SEAN MCMANUS listed his employer as California Prep in documents related to Farmers & Merchants bank account (270****5) for California STEAM San Bernardino/ Uplift California.

OVERT ACT NO. (462): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****5) for California STEAM San Bernardino/ Uplift California indicate ELI JOHNSON is a co-authorized user for the account.

OVERT ACT NO. (463): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****5) for California STEAM San Bernardino/ Uplift California indicate ELI JOHNSON is employed by California Prep.

OVERT ACT NO. (464): On or about October 26, 2017, The California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****5), and listed SEAN MCMANUS as the CEO/Secretary for the non-profit.

OVERT ACT NO. (465): On or about October 26, 2017, The California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****5), and listed ELI JOHNSON as an authorized signer the account.

OVERT ACT NO. (466): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for UPLIFT California Charter Schools (C393004).

OVERT ACT NO. (467): On or about August 17, 2018, annual business filing for UPLIFT California Charter Schools (C393004) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (468): On or about August 17, 2018, annual business filing for UPLIFT California Charter Schools (C393004) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.
UPLIFT NORTH:

OVERT ACT NO. (469): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift North for \$2,144,560.

OVERT ACT NO. (470): Between January 1, 2017 to February 11, 2019, Uplift North paid A3 Consulting \$398,210.

OVERT ACT NO. (471): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift North for \$85,604.

CHARGES (cont'd)

OVERT ACT NO. (472): Between January 1, 2017 to February 11, 2019, Uplift North paid A3 Education \$85,604.

OVERT ACT NO. (473): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift North for \$325,832.

OVERT ACT NO. (474): Between January 1, 2017 to February 11, 2019, Uplift North paid Global Consulting Services \$66,632.

OVERT ACT NO. (475): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Uplift North for \$45,000.

OVERT ACT NO. (476): Between January 1, 2017 to February 11, 2019, Uplift North paid Mad Dog Marketing \$45,000.

OVERT ACT NO. (477): On or about July 1, 2017, at the direction of SEAN MCMANUS, Luiz Rigney submitted a charter petition to and was granted authorization for Uplift Ca North by the Bradley Elementary School District.

OVERT ACT NO. (478): On or about July 1, 2017, charter petition for Uplift CA North listed Luiz Rigney as lead petitioner and contact for the school to Bradley Elementary School District.

OVERT ACT NO. (479): On or about July 1, 2017, charter petition for Uplift CA North listed C Ceriman, ROBERT WILLIAMS, Eric Johnson, Darrin Erb, Caroline Nuttall and JASON SCHROCK as the founding board members.

OVERT ACT NO. (480): On or about October 26, 2017, SEAN MCMANUS and ELI JOHNSON opened Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH.

OVERT ACT NO. (481): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH identifies the address associated with the account as 711 17th St, Unit 8E, Costa Mesa, CA 92627.

OVERT ACT NO. (482): On or about October 26, 2017, SEAN MCMANUS identified his employer as California Prep in bank documents for Farmers & Merchants bank account (270****9).

OVERT ACT NO. (483): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH showed ELI JOHNSON as the co-authorized signor and listed his employer as California Prep.

OVERT ACT NO. (484): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH showed ELI JOHNSON's employer as California Prep.

CHARGES (cont'd)

OVERT ACT NO. (485): On or about October 26, 2017, The California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH and listed SEAN MCMANUS as the CEO/Secretary for the non-profit and the account.

OVERT ACT NO. (486): On or about October 26, 2017, The California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH and listed ELI JOHNSON as an authorized signer the account.

OVERT ACT NO. (487): On or about October 26, 2017, JASON SCHROCK was listed on the IRS documentation (FORM 990) for UPLIFT NORTH.

OVERT ACT NO. (488): On or about October 27, 2017, UPLIFT North (C4079377) was registered in the State of California as a non-profit.

OVERT ACT NO. (489): On or about October 27, 2017, UPLIFT North (C4079377) business filing uses address 3300 Irvine Ave, Suite 330, Newport Beach, CA 92620 as its corporation address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (490): On or about February 27, 2018, UPLIFT North (C4079377) annual business filing lists Rob Sikma as the CEO and Klarc Korver as the Secretary.

OVERT ACT NO. (491): On or about February 27, 2018, UPLIFT North (C4079377) annual business filing lists ROBERT WILLIAMS as the CFO.

UPLIFT SOUTH:

OVERT ACT NO. (492): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift South for \$1,917,942.

OVERT ACT NO. (493): Between January 1, 2017 to February 11, 2019, Uplift South paid A3 Consulting \$1,459,706.

OVERT ACT NO. (494): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift South for \$139,398.

OVERT ACT NO. (495): Between January 1, 2017 to February 11, 2019, Uplift South paid A3 Education \$139,398.

OVERT ACT NO. (496): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift South for \$367,704.

OVERT ACT NO. (497): Between January 1, 2017 to February 11, 2019, Uplift South paid Global Consulting Services \$108,504.

CHARGES (cont'd)

OVERT ACT NO. (498): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Uplift South for \$45,000.

OVERT ACT NO. (499): Between January 1, 2017 to February 11, 2019, Uplift South paid Mad Dog Marketing \$45,000.

OVERT ACT NO. (500): On or about July 1, 2017, at the direction of SEAN MCMANUS, Luis Rigney submitted a charter petition to and was granted authorization for Uplift Ca South by the Bradley Elementary School District.

OVERT ACT NO. (501): On or about July 1, 2017, charter petition for Uplift CA South listed Luis Rigney as lead petitioner and contact for the school to Bradley Elementary School District.

OVERT ACT NO. (502): On or about July 1, 2017, charter petition for Uplift CA South listed C Ceriman, ROBERT WILLIAMS, Eric Johnson, Darrin Erb, Caroline Nuttall and JASON SCHROCK as the founding board members.

OVERT ACT NO. (503): On or about October 26, 2017, SEAN MCMANUS and ELI JOHNSON opened Farmers & Merchants bank account (270****7) for California STEAM San Bernardino/ Uplift SOUTH Account.

OVERT ACT NO. (504): On or about October 26, 2017, SEAN MCMANUS identified his employer as California Prep in bank documents for Farmers & Merchants bank account (270****7) for California STEAM San Bernardino/ Uplift SOUTH.

OVERT ACT NO. (505): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****7) for California STEAM San Bernardino/ Uplift SOUTH listed ELI JOHNSON's employer as California Prep.

OVERT ACT NO. (506): On or about October 26, 2017, the California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****7) for California STEAM San Bernardino/ Uplift SOUTH which listed SEAN MCMANUS as the CEO/Secretary for the non-profit.

OVERT ACT NO. (507): On or about October 26, 2017, the California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****7) for California STEAM San Bernardino/ Uplift SOUTH which listed ELI JOHNSON as an authorized signer on the account.

OVERT ACT NO. (508): On or about October 27, 2017, UPLIFT South (C4079376) was registered in the State of California as a non-profit.

OVERT ACT NO. (509): On or about October 27, 2017, UPLIFT South (C4079376) business filing uses address 3300 Irvine Ave, Suite 330, Newport Beach, CA 92620 as its corporation address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (510): On or about February 27, 2018, UPLIFT SOUTH (C4079376) submitted an updated business filing.

CHARGES (cont'd)

OVERT ACT NO. (511): On or about February 27, 2018, UPLIFT SOUTH (C4079376) business filing lists Rob Sikma as the CEO and Klarc Korver as the Secretary.

OVERT ACT NO. (512): On or about February 27, 2018, UPLIFT SOUTH (C4079376) business filing lists ROBERT WILLIAMS as the CFO.

OVERT ACT NO. (513): On or about February 27, 2018, UPLIFT SOUTH (C4079376) annual business filing lists 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.
UPLIFT SANTA BARBARA:

OVERT ACT NO. (514): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift Santa Barbara for \$3,408,022.

OVERT ACT NO. (515): Between January 1, 2017 to February 11, 2019, Uplift Santa Barbara paid A3 Consulting \$1,825,372.

OVERT ACT NO. (516): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift Santa Barbara for \$38,358.

OVERT ACT NO. (517): Between January 1, 2017 to February 11, 2019, Uplift Santa Barbara paid A3 Education \$38,358.

OVERT ACT NO. (518): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift Santa Barbara for \$482,360.

OVERT ACT NO. (519): Between January 1, 2017 to February 11, 2019, Uplift Santa Barbara paid Global Consulting Services \$223,160.

OVERT ACT NO. (520): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Uplift Santa Barbara for \$60,000.

OVERT ACT NO. (521): Between January 1, 2017 to February 11, 2019, Uplift Santa Barbara paid Mad Dog Marketing \$60,000.

OVERT ACT NO. (522): In or around and between January and July 2017, ELI JOHNSON

OVERT ACT NO. (523): On or about October 26, 2017, SEAN MCMANUS and ELI JOHNSON opened Farmers & Merchants bank account (270****3) for California STEAM San Bernardino/ Uplift Santa Barbara.

CHARGES (cont'd)

OVERT ACT NO. (524): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****3) for California STEAM San Bernardino/ Uplift Santa Barbara used the address-711 17th St, Unit 8E, Costa Mesa, CA 92627.

OVERT ACT NO. (525): On or about October 26, 2017, SEAN MCMANUS identified his employer as California Prep in bank documents for Farmers & Merchants bank account (270****3) for California STEAM San Bernardino/ Uplift Santa Barbara.

OVERT ACT NO. (526): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****3) for California STEAM San Bernardino/ Uplift Santa Barbara showed ELI JOHNSON as the co-authorized user.

OVERT ACT NO. (527): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****3) for California STEAM San Bernardino/ Uplift Santa Barbara showed ELI JOHNSON's employer as California Prep.

OVERT ACT NO. (528): On or about October 27, 2017, UPLIFT California Santa Barbara (C4079227) was registered in the State of California as a non-profit.

OVERT ACT NO. (529): On or about October 27, 2017, UPLIFT California Santa Barbara (C4079227) business filing used 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as a corporate address, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS. .

OVERT ACT NO. (530): On or about February 27, 2018, UPLIFT CA Santa Barbara (C4079227) submitted an annual filing for non-profits.

OVERT ACT NO. (531): On or about February 27, 2018, UPLIFT CA Santa Barbara (C4079227) annual filing identified Rob Sikma as the CEO and Klarc Korver as the Secretary.

OVERT ACT NO. (532): On or about February 27, 2018, UPLIFT CA Santa Barbara (C4079227) annual filing identified ROBERT WILLIAMS as the CFO.

OVERT ACT NO. (533): On or about February 27, 2018, UPLIFT CA Santa Barbara (C4079227) annual filing identified 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (534): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (535): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018 and in the audit, reviewed compliance with funding determinations and attendance.

CHARGES (cont'd)

OVERT ACT NO. (536): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018 and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (537): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018 and listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

CALIFORNIA ACADEMY OF SPORTS SCIENCE:

OVERT ACT NO. (538): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced California Academy of Sports Science for \$2,370,179.

OVERT ACT NO. (539): Between January 1, 2017 to February 11, 2019, California Academy of Sports Science paid A3 Consulting \$1,530,179.

OVERT ACT NO. (540): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced California Academy of Sports Science for \$438,621.

OVERT ACT NO. (541): Between January 1, 2017 to February 11, 2019, California Academy of Sports Science paid A3 Education \$438,621.

OVERT ACT NO. (542): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced California Academy of Sports Science for \$169,216.

OVERT ACT NO. (543): Between January 1, 2017 to February 11, 2019, California Academy of Sports Science paid Global Consulting Services \$169,216.

OVERT ACT NO. (544): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA California Academy of Sports Science for \$90,000.

OVERT ACT NO. (545): Between January 1, 2017 to February 11, 2019, California Academy of Sports Science paid Mad Dog Marketing \$90,000.

OVERT ACT NO. (546): On or about August 10, 2017, JUSTIN SCHMITT submitted a charter petition to and was granted authorization for California Academy of Sports Science by the Dehesa Elementary School District.

OVERT ACT NO. (547): On or about August 10, 2017, JUSTIN SCHMITT claimed to Dehesa Elementary School District that California Academy of Sports Science was a stand-alone school.

OVERT ACT NO. (548): On or about August 10, 2017, charter petition for California Academy of Sports Science, listed Rob Sikma, Raymond Uzeta, Klarc Korver, ROBERT WILLIAMS and Eric Johnson as founding Board members.

CHARGES (cont'd)

OVERT ACT NO. (549): On or about August 10, 2017, charter petition for California Academy of Sports Science included Articles of Incorporation from 'Online of Southern California' C3966287 listing JASON SCHROCK as the registered agent.

OVERT ACT NO. (550): On or about September 26, 2017, SEAN MCMANUS signed the agreement between EDCBO Group and California Academy of Sports Science on behalf of California Academy of Sports Science.

OVERT ACT NO. (551): On or about October 27, 2017, JASON SCHROCK and ELI JOHNSON opened Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego.

OVERT ACT NO. (552): On or about October 27, 2017, bank documents for Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego used 3300 Irvine Ave, Suite 330, Newport Beach, Ca 92660 as the address for the corporation which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (553): On or about October 27, 2017, JASON SCHROCK listed his employer as A3 Education on Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego.

OVERT ACT NO. (554): On or about October 27, 2017, bank documents for Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego lists ELI JOHNSON's employer as California Prep.

OVERT ACT NO. (555): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego and listed Robert Sikma as the CEO of the corporation.

OVERT ACT NO. (556): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego and listed JASON SCHROCK as an authorized signer on the account.

OVERT ACT NO. (557): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego and listed ELI JOHNSON as an authorized signer on the account.

OVERT ACT NO. (558): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (559): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018, and in the audit, reviewed compliance with funding determinations and attendance.

CHARGES (cont'd)

OVERT ACT NO. (560): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018 and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (561): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018 and listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (562): On or about August 30, 2018 Kevin Tu wrote a letter authorizing ROBERT WILLIAMS to consent to opening up a corporation for California Academy of Sports Science San Diego.

OVERT ACT NO. (563): On or about September 21, 2018, ROBERT WILLIAMS registered California Academy of Sports Science Southern California (CASS San Diego) (C4197221) with the State of California as a non-profit.

OVERT ACT NO. (564): On or about September 20, 2018, annual business filing for California Academy of Sports Science Southern California (CASS San Diego) (C4197221) used 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as its corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (565): On or about November 7, 2018, Viku Mehta submitted an updated business filing for California Academy of Sports Science Southern California (CASS San Diego) (C4197221).

OVERT ACT NO. (566): On or about November 7, 2018, updated business filing for California Academy of Sports Science Southern California (CASS San Diego) (C4197221) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO and registered agent.

OVERT ACT NO. (567): On or about November 7, 2018, updated business filing for California Academy of Sports Science Southern California (CASS San Diego) (C4197221) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as its corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

CALIFORNIA ACADEMY OF SPORTS SCIENCE FRESNO:

OVERT ACT NO. (568): On or around and between July 2017-January 2018, at the direction of JASON SCHROCK, Fernando Napoles petitioned for and obtained authorization for the California Academy of Sports Science Fresno from the Raisin City Elementary School District.

OVERT ACT NO. (569): On or about October 27, 2017, JASON SCHROCK and ELI JOHNSON opened Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno.

OVERT ACT NO. (570): On or about October 27, 2017, bank documents for Farmers & Merchants account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno used 3300 Irvine Ave, Suite 330, Newport Beach, Ca 92660 which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

CHARGES (cont'd)

OVERT ACT NO. (571): On or about October 27, 2017, JASON SCHROCK listed his employer as A3 Education on Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno.

OVERT ACT NO. (572): On or about October 27, 2017, bank documents for Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno list ELI JOHNSON's employer as California Prep.

OVERT ACT NO. (573): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno and listed Robert Sikma as CEO and Klarc Korver as SECRETARY for the corporation.

OVERT ACT NO. (574): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno and listed JASON SCHROCK as an Officer.

OVERT ACT NO. (575): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno and listed ELI JOHNSON as an authorized signer on the account.

OVERT ACT NO. (576): On or about November 16, 2017, California Academy of Sports Science Fresno-CASS Fresno (C4084189) was registered with the State of California as a non-profit by Kevin Tu.

OVERT ACT NO. (577): On or about November 16, 2017, California Academy of Sports Science Fresno-CASS Fresno (C4084189) business filing lists 3300 Irvine Ave, Suite 330, Newport Beach, CA 92620 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (578): On or about December 28, 2017, SEAN MCMANUS opened Farmers & Merchants bank account (270***0) for CA STEAM San Bernardino- California Academy of Sports Science Fresno.

OVERT ACT NO. (579): On or about December 28, 2017, SEAN MCMANUS listed his employer as California Prep on documentation for Farmers & Merchants bank account (270***0) for CA STEAM San Bernardino- California Academy of Sports Science Fresno.

OVERT ACT NO. (580): On or about December 28, 2017, bank documents for Farmers & Merchants bank account (270***0) for CA STEAM San Bernardino- California Academy of Sports Science Fresno listed ELI JOHNSON as the co-authorized user of the account.

OVERT ACT NO. (581): On or about December 28, 2017, bank documents for Farmers & Merchants bank account (270***0) for CA STEAM San Bernardino- California Academy of Sports Science Fresno listed ELI JOHNSON as an employee of California Prep.

CHARGES (cont'd)

OVERT ACT NO. (582): On or about December 28, 2017, the California STEAM San Bernardino Board approved a board resolution authorizing opening Farmers & Merchants bank account (270***0) CA STEAM San Bernardino-California Academy of Sports Science Fresno, which listed SEAN MCMANUS as the CEO/Secretary for the non-profit.

OVERT ACT NO. (583): On or about December 28, 2017, the California STEAM San Bernardino Board approved a board resolution authorizing opening Farmers & Merchants bank account (270***0) CA STEAM San Bernardino-California Academy of Sports Science Fresno, which listed ELI JOHNSON as an authorized signer for the account.

OVERT ACT NO. (584): On or about May 4, 2018, Viku Mehta submitted an annual business filing for California Academy of Sports Science Fresno- CASS Fresno (C4084189).

OVERT ACT NO. (585): On or about May 4, 2018, California Academy of Sports Science Fresno- CASS Fresno (C4084189) annual business filing listed Kevin Tu CEO of the corporation and registered agent.

OVERT ACT NO. (586): On or about May 4, 2018, California Academy of Sports Science Fresno- CASS Fresno (C4084189) annual business filing listed Jessica Bulk as a Board Member of the corporation yet Jessica Bulk never attending any Board meetings.

OVERT ACT NO. (587): On or about May 4, 2018, California Academy of Sports Science Fresno- CASS Fresno (C4084189) annual business filing listed Lambert Sikkema as CFO of the corporation yet Lambert Sikkema was unaware of his position as CFO of the corporation.

OVERT ACT NO. (588): On or about December 14, 2018 Jeffrey Hill submitted and annual audit for California Academy of Sports Science Fresno dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (589): On or about December 14, 2018 Jeffrey Hill submitted and annual audit for California Academy of Sports Science Fresno dated June 30, 2018 and in the audit, reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (590): On or about December 14, 2018 Jeffrey Hill submitted and annual audit for California Academy of Sports Science Fresno dated June 30, 2018 and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (591): On or about December 14, 2018 Jeffrey Hill submitted and annual audit for California Academy of Sports Science Fresno dated June 30, 2018 and listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (592): On or around July 30, 2018, JASON SCHROCK told Jessica Bulk she was part of the founding team but was not a Board member of California Academy of Sports Science.

OVERT ACT NO. (593): On or around July 30, 2018, JASON SCHROCK sent Jessica Bulk documents for her wet signature so he could open a bank account for California Academy of Sports Science Fresno.

CHARGES (cont'd)

UNIVERSITY PREP:

OVERT ACT NO. (594): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced University Prep for \$6,194,809.48.

OVERT ACT NO. (595): Between January 1, 2017 to February 11, 2019, University Prep paid A3 Consulting \$4,828,114.45.

OVERT ACT NO. (596): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced University Prep for \$216,000.

OVERT ACT NO. (597): Between January 1, 2017 to February 11, 2019, University Prep paid Global Consulting Services \$216,000.

OVERT ACT NO. (598): On or around May 8, 2018, JUSTIN SCHMITT submitted a charter petition and obtain authorization for University Prep from the Dehesa Elementary School District.

OVERT ACT NO. (599): On or around May 8, 2018 JUSTIN SCHMITT informed the Dehesa Elementary School District that University Prep was a standalone charter school focused on university partnerships.

OVERT ACT NO. (600): On or about May 8, 2018, the charter petition for University PREP San Bernardino listed Ceriman, ROBERT WILLIAMS, Eric Johnson, Kevin Tu, Joel Carlson and Lambert Sikkema as founding board members.

OVERT ACT NO. (601): On or about May 8, 2018, the charter petition for University PREP included Articles of Incorporation for the non-profit corporation 'Online of Southern California' (C3966287) to support the charter school, which identified JASON SCHROCK.

OVERT ACT NO. (602): On or about September 20, 2018, Viku Mehta, employee of ROBERT WILLIAMS, submitted an annual business filing for University PREP Charter (C4161006).

OVERT ACT NO. (603): On or about September 20, 2018, annual business filing for University PREP Charter (C4161006) listed Jessica Bulk as the Secretary and Lambert Sikkema as the CFO.

OVERT ACT NO. (604): On or about September 20, 2018, Jessica Bulk and Lambert Sikkema were unaware their names were used on corporate documents.

OVERT ACT NO. (605): On or about September 20, 2018, annual business filing for University PREP Charter (C4161006) listed 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS. .

UNIVERSITY PREP SAN BERNARDINO:

CHARGES (cont'd)

OVERT ACT NO. (606): On or about April 16, 2018, ELI JOHNSON and JUSTIN SCHMITT submitted a charter petition to and was granted authorization for University PREP San Bernardino by the Trona Joint Unified School District.

OVERT ACT NO. (607): On or around April 16, 2018 JUSTIN SCHMITT informed the Trona Joint Unified School District that University Prep was a standalone charter school focused on university partnerships.

OVERT ACT NO. (608): On or about April 16, 2018, the charter petition for University PREP San Bernardino designated ELI JOHNSON as the lead petitioner and contact for the charter school to Trona Joint Unified School District.

OVERT ACT NO. (609): On or about April 16, 2018, the charter petition for University PREP San Bernardino listed ELI JOHNSON, C Ceriman, ROBERT WILLIAMS, Eric Johnson, Kevin Tu, Joel Carlson and Lambert Sikkema as founding board members.

OVERT ACT NO. (610): On or about April 16, 2018, the charter petition for University PREP San Bernardino included Articles of Incorporation for the non-profit corporation 'Online of Southern California' (C3966287) to support the charter school, which identified JASON SCHROCK.

OVERT ACT NO. (611): On or about July 2, 2018, Viku Mehta, an employee of ROBERT WILLIAMS registered University PREP San Bernardino Charter School (C4170889) as a non-profit corporation.

OVERT ACT NO. (612): On or about July 2, 2018, the business filing for University PREP San Bernardino 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as its corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS..

OVERT ACT NO. (613): On or about October 17, 2018, Viku Mehta, an employee of ROBERT WILLIAMS, submitted a business filing for University PREP San Bernardino Charter School (C4170889).

OVERT ACT NO. (614): On or about October 17, 2018, in business filing for University PREP San Bernardino Charter School (C4170889) Rob Sikma was listed as the CEO, Klarc Korver as the Secretary, and Kevin Tu was listed as the CFO and registered agent.

UNIVERSITY PREP FRESNO:

OVERT ACT NO. (615): On or about March 29, 2018, at the direction of JASON SCHROCK, Fernando Napoles submitted a charter petition to and was granted authorization for University PREP Fresno Charter School by the Raisin City Elementary School District.

OVERT ACT NO. (616): On or about March 29, 2018, the charter petition for University Prep Fresno listed Fernando Napoles as the lead petitioner and contact for the school to the Raisin City Elementary School District.

CHARGES (cont'd)

OVERT ACT NO. (617): On or about March 29, 2018, the charter petition for University Prep Fresno listed Fernando Napoles, Jessica Bulk, Lambert Sikkema, Joel Carson and Kevin Tu as the founding board members.

OVERT ACT NO. (618): On or about March 29, 2018, the charter petition for University Prep Fresno included Articles of Incorporation for the non-profit corporation 'Online of Southern California' (C3966287) to support the charter school, which identified JASON SCHROCK.

OVERT ACT NO. (619): On or about November 6, 2018, Rob Sikma registered University PREP Fresno (C4211031) as a non-profit corporation.

OVERT ACT NO. (620): On or about November 6, 2018, business filing for registered University PREP Fresno (C4211031) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as its corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (621): On or about November 7, 2018, Viku Mehta, an employee of ROBERT WILLIAMS, submitted an updated business filing for University PREP Fresno (C4211031).

OVERT ACT NO. (622): On or about November 7, 2018, updated business filing for University PREP Fresno (C4211031) listed Rob Sikma as the CEO, Klarc Korver as the Secretary and Kevin Tu as the CFO and registered agent.

CALIFORNIA VANGUARD ACADEMY FRESNO:

OVERT ACT NO. (623): On or about May 1, 2018, at the direction of JASON SCHROCK, Fernando Napoles submitted a charter petition to and was granted authorization for California Vanguard Academy-Fresno Charter School by the Raisin City Elementary School District.

OVERT ACT NO. (624): On or about May 1, 2018, the charter petition for California Vanguard Academy-Fresno identified Fernando Napoles as the lead petition and contact person for the charter school to the Raisin City Elementary School District.

OVERT ACT NO. (625): On or about May 1, 2018, the charter petition for California Vanguard Academy-Fresno listed Fernando Napoles, Jessica Bulk, Lambert Sikkema, Joel Carson and Kevin Tu as the founding board members.

OVERT ACT NO. (626): On or about May 1, 2018, the charter petition for California Vanguard Academy-Fresno included Articles of Incorporation for the non-profit corporation 'Online of Southern California' (C3966287) to support the charter school, which identified JASON SCHROCK.

OVERT ACT NO. (627): On or about November 6, 2018, Rob Sikma registered CA Vanguard Academy (C4211032) as a non-profit corporation.

OVERT ACT NO. (628): On or about November 6, 2018, business filing for registered CA Vanguard Academy (C4211032) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as its corporate address.

CHARGES (cont'd)

OVERT ACT NO. (629): On or about November 7, 2018, Viku Mehta, employee of ROBERT WILLIAMS, submitted an updated business filing for CA Vanguard Academy (C4211032).

OVERT ACT NO. (630): On or about November 7, 2018, updated business filing for CA Vanguard Academy (C4211032) listed Rob Sikma as the CEO, Klarc Korver as the Secretary and Kevin Tu as the CFO and registered agent.

OVERT ACT NO. (631): On or about November 7, 2018, updated business filing for CA Vanguard Academy (C4211032) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as its corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

COUNT 4 - CONSPIRACY TO COMMIT A CRIME

On or about and between January 1, 2016 and April 20, 2018, SEAN JOSEPH MCMANUS, JUSTIN KENT SCHMITT, JASON ALAN SCHROCK, NYLA JUNE CRIDER, MICHELLE CLAUDIA KALEHUA KUKAHIKO, and KEALII TROY KUKAHIKO did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Grand Theft, PC 487, Prodigy Athletes, in violation of PENAL CODE SECTION 182(a)(1).

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

The object of the conspiracy was to misappropriate public funds by falsely claiming and obtaining apportionment funding for students attending charter schools when the students were not receiving charter school services at the time claimed. Conspirators knowingly paid pre-existing athletic organizations for student report cards and falsified charter school enrollment documentation which allowed the conspirators to request and obtain state funding for the athletic participants over summer under false cover of them being students of charter schools. Conspirators knowingly obtained state funding for children who were not assigned certificated teachers as required by law, were not in contact with the charter school, and who were not provided any educational services during the dates claimed.

OVER ACT NO. (1): On or about November 2016, JASON SCHROCK and SEAN MCMANUS, through the corporation Academics, Arts and Action Charter Academy, purchased the rights from Foundation Learning LLC to manage, operate, and collect public funds from two charter schools, Mosaica Online Academy of Southern California and Mosaica Online Academy of Los Angeles.

OVER ACT NO. (2): On or about December 5, 2016, David Foster filed Articles of Incorporation for Online Academy of Los Angeles (C3966286) with the State of California.

OVER ACT NO. (3): On or about December 5, 2016, business filing for Online Academy of Los Angeles (C3966286) listed JASON SCHROCK as the Agent for service of process.

CHARGES (cont'd)

OVER ACT NO. (4): On or about December 5, 2016, Caitlin Alexander filed Articles of Incorporation for Online of Southern California (C3966287) with the State of California.

OVER ACT NO. (5): On or about December 5, 2016, business filing for Online of Southern California (C3966287) listed JASON SCHROCK as the Agent for service of process.

OVER ACT NO. (6): On or about December 30, 2016 the corporate governing board for Mosaica Online Academy of Southern California (Charter School), Mosaica Online Academy of Southern California (Corporation C3216022), merged with the corporation Online of Southern California (C3966287) and dissolved, leaving Online of Southern California (C3966287) as the surviving corporation.

OVER ACT NO. (7): On or about December 30, 2016 the corporate governing board for Mosaica Online Academy of Los Angeles (Charter School), Mosaica Online Academy of Los Angeles (Corporation C3694447), merged with the corporation Online Academy of Los Angeles (C3966286) and dissolved, leaving Online Academy of Los Angeles (C3966286) as the surviving corporation.

OVER ACT NO. (8): On or about August 2, 2017, Online Academy of Southern California (C3966287) changed its name to Valiant Academy San Diego.

OVER ACT NO. (9): On or about August 2, 2017, Online Academy of Los Angeles (C3966286) changed its name to Valiant Academy LA.

OVER ACT NO. (10): On or about and between November 2016, and April 2018, Mosaica Online Academy of Southern California (Charter School) operated under the names: Valiant Academy Southern California, Valiant Academy San Diego, Valiant Preparatory Academy Southern California, Valiant Preparatory Academy San Diego, Valiant Prep Southern California, Valiant Prep San Diego, Valiant DESD, Valiant San Diego, and Valiant Academy San Diego all of which are the same charter school authorized by Dehesa Elementary School District.

OVER ACT NO. (11): On or about and between November, 2016 and April, 2018, Mosaica Online Academy of Los Angeles (Charter School) operated under the names: Valiant Academy Los Angeles, Valiant Academy Los Angeles, Valiant Preparatory Academy, Valiant Preparatory Academy Los Angeles, Valiant Prep Los Angeles, Valiant Prep LA, Valiant LA, all of which are Valiant Academy Los Angeles and was the same charter school authorized by Acton Agua Dulce Unified School District.

OVER ACT NO. (12): On or about September 25, 2017, JASON SCHROCK and Eli Johnson signed an account agreement with Farmers and Merchants Bank to open a bank account for Valiant Academy San Diego, bank account number ****2497.

OVER ACT NO. (13): On or about October 19, 2017, JASON SCHROCK and Eli Johnson signed an account agreement with Farmers and Merchants Bank to open a bank account for Valiant Academy LA, bank account number****2462.

CHARGES (cont'd)

OVER ACT NO. (14): On or about April 24, 2017, SEAN MCMANUS and JASON SCHROCK hired NYLA CRIDER to expand enrollment in Valiant Charter Schools.

OVER ACT NO. (15): On or about April 24, 2017, SEAN MCMANUS texted NYLA CRIDER to congratulate her for joining the team.

OVER ACT NO. (16): On or about April 24, 2017, NYLA CRIDER texted SEAN MCMANUS she was excited about making Valiant Charter Schools the most sought after charter school.

OVER ACT NO. (17): On or about April 24, 2017, SEAN MCMANUS directed NYLA CRIDER via text to get going on summer school.

OVER ACT NO. (18): On or about April 27, 2017, NYLA CRIDER texted JASON SCHROCK and SEAN MCMANUS regarding her son's football program so they could try to recruit the football program to participate in Valiant Charter Schools' summer credit recovery program.

OVER ACT NO. (19): On or about May 6, 2017, SEAN MCMANUS texted NYLA CRIDER to tell a teacher he would help her obtain "high quality teacher" status if she came to Valiant Charter Schools and brought 30 students with her.

OVER ACT NO. (20): On or about May 8, 2017, JASON SCHROCK and SEAN MCMANUS explained to NYLA CRIDER via text that a master agreement, birth certificate and proof of address was needed to enroll kids in the summer program for Valiant Charter Schools.

OVER ACT NO. (21): On or about May 9, 2017, KALEHUA KUKAHIKO was hired by Valiant Academy as a registrar for a salary of \$50,000.

OVER ACT NO. (22): On or about May 12, 2017, SEAN MCMANUS texted NYLA CRIDER not to end Valiant Charter Schools' summer program on August 21, 2017, because they would have students from other private and charter school throughout southern California who would return to their schools in the Fall on a wide variety of dates.

OVER ACT NO. (23): On or about June 8, 2017, SEAN MCMANUS texted NYLA CRIDER about enrollment, encouraging her to "keep it rocking."

OVER ACT NO. (24): On or about June 10, 2017, SEAN MCMANUS texted NYLA CRIDER he would pay \$25,000 to a high school booster club if they could bring over 1,000 students to Valiant Charter Schools.

OVER ACT NO. (25): On or about June 10, 2017, NYLA CRIDER discussed with KALEHUA KUKAHIKO if San Juan Hills High School would be interested in coming to Valiant Charter Schools.

OVER ACT NO. (26): On or about June 10, 2017, KALEHUA KUKAHIKO texted NYLA CRIDER that she would "pitch" the idea to recruit San Juan Hills High School to her husband, TROY KUKAHIKO.

CHARGES (cont'd)

OVER ACT NO. (27): On or about June 29, 2017, SEAN MCMANUS approved via text NYLA CRIDER allowing teachers to supervise 60, 64 and 71 students during the summer.

OVER ACT NO. (28): On or around June 29, 2017, NYLA CRIDER exceeded the allowable teacher to student ratio under the Education Code with her staff at Valiant Charter Schools because they didn't have enough teachers for the amount of students they had enrolled.

OVER ACT NO. (29): On or about July 3, 2017, TROY KUKAHIKO and NYLA CRIDER agreed to use Prodigy Athletes as a vendor of Valiant Charter Schools so Prodigy Athletes could "donate" money back to participating organizations to help recruit them.

OVER ACT NO. (30): On or about July 3, 2017, NYLA CRIDER authorized TROY KUKAHIKO to backdate student registration dates to July 1, 2017, for students recruited by Prodigy Athletes.

OVER ACT NO. (31): On or about July 10, 2017, TROY KUKAHIKO filed Articles of Incorporation on behalf of Prodigy Athletes Foundation.

OVER ACT NO. (32): On or about July 11, 2017, Prodigy athletes applied as a vendor with Valiant Charter Schools.

OVER ACT NO. (33): On or about July 12, 2017, SEAN MCMANUS approved via text, that NYLA CRIDER provide full funding to high school athletes that enrolled by August 1, 2017, as long as their registration documents were all backdated to July 1, 2017.

OVER ACT NO. (34): On or about July 12, 2017, SEAN MCMANUS gave NYLA CRIDER an immediate \$25,000 raise and set enrollment benchmarks for bonuses up to an additional \$30,000.

OVER ACT NO. (35): On or about July 12-13, 2017, NYLA CRIDER, TROY KUKAHIKO, KALEHUA KUKAHIKO, and San Juan Hills High School teacher and head football coach, Aaron Flowers, collaborated to create an email to send parents of San Juan Hills High School football players explaining Prodigy Athletes' summer program with Valiant Charter Schools.

OVER ACT NO. (36): On or about July 12-13, 2017, Aaron Flowers agreed with NYLA CRIDER to act as Valiant's teacher of record for the Prodigy Athlete's summer course.

OVER ACT NO. (37): On or about July 12-13, 2017, SEAN MCMANUS told NYLA CRIDER Valiant Charter Schools could pay the booster club directly and didn't need to employ Aaron Flowers.

OVER ACT NO. (38): On or about July 12-13, 2017, Prodigy Athletes TROY KUKAHIKO agreed to give the San Juan Hills High School football team \$200 for each athlete that signed up with Prodigy Athletes.

CHARGES (cont'd)

OVER ACT NO. (39): On or about July 13, 2017, NYLA CRIDER and KALEHUA KUKAHIKO emailed Aaron Flowers a Master Agreement (MA) form with the course start date and student, parent, and supervising teacher signature dates already listed as July 1, 2017, so the forms would be appropriately backdated for Valiant Charter Schools.

OVER ACT NO. (40): On or about July 13, 2017, NYLA CRIDER asked TROY KUKAHIKO to create a course name for Prodigy Athletes' summer program with Valiant Charter Schools, even though the course was supposed to have started on July 1, 2017.

OVER ACT NO. (41): On or about July 13, 2017, KALEHUA KUKAHIKO advised NYLA CRIDER that TROY KUKAHIKO decided to name the course Students With Academic Goals (SWAG).

OVER ACT NO. (42): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER asking about Valiant's enrollment numbers.

OVER ACT NO. (43): On or about July 13, 2017, NYLA CRIDER reported to SEAN MCMANUS via text that Valiant's enrollment was 1,224 but would increase once the high school athletes came in.

OVER ACT NO. (44): On or about July 13, 2017, NYLA CRIDER texted SEAN MCMANUS she just recruited two more "big football programs" for the summer.

OVER ACT NO. (45): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER to recruit as many high school teams as she could.

OVER ACT NO. (46): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER "go hard" for next six weeks and make sure all documents were dated July 1, 2017.

OVER ACT NO. (47): On or about July 13, 2017, NYLA CRIDER texted SEAN MCMANUS "I will" in response to SEAN MCMANUS's direction to "go hard."

OVER ACT NO. (48): On or about July 16, 2017, TROY KUKAHIKO emailed Raymond Toilolo, football coach at Helix High School about Prodigy Athletes' SWAG Program.

OVER ACT NO. (49): On or about July 17, 2017, TROY KUKAHIKO emailed Vincent Lobendahn, football coach at John Glenn High School about Prodigy Athletes' SWAG Program.

OVER ACT NO. (50): On or about July 20, 2017, TROY KUKAHIKO emailed Jason Negro, football coach for John Bosco High School about Prodigy Athletes' SWAG Program.

OVER ACT NO. (51): On or about July 17, 2017, Aaron Flowers emailed San Juan Hills High School football families advising all 9th to 12th grade boys would be participating in Prodigy Athletes' SWAG program. Parents were directed to complete the Master Agreement (MA), which showed the start date for the course as July 1, 2017 and end date as August 21, 2017.

CHARGES (cont'd)

OVER ACT NO. (52): On or about July 17, 2017, several San Juan Hills High School parents emailed Aaron Flowers to express concerns regarding Prodigy Athletes' SWAG program.

OVER ACT NO. (53): On or about July 17, 2017, Flowers sought guidance from NYLA CRIDER, KALEHUA KUKAHIKO, and TROY KUKAHIKO on how to respond to the concerned San Juan Hills High School parents.

OVER ACT NO. (54): On or about July 17, 2017, NYLA CRIDER consulted with SEAN MCMANUS on how Aaron Flowers should respond to the concerned San Juan Hills High School parents.

OVER ACT NO. (55): On or about July 17, 2017, TROY KUKAHIKO emailed NYLA CRIDER, KALEHUA KUKAHIKO and Aaron Flowers and stated the SWAG "components" were built into the current San Juan Hills High School football program and didn't require students to spend any time outside of football practice.

OVER ACT NO. (56): On or about July 17, 2017, Aaron Flowers responded to the concerned San Juan Hills High School football parents and notified all families that participation in Prodigy Athletes' SWAG program was voluntary and not mandatory.

OVER ACT NO. (57): On or around July 17, 2017, San Juan Hills High School parent Elizabeth Eaton was unaware she was being asked and ultimately signed her child up for a charter school as part of Prodigy Athletes' SWAG program.

OVER ACT NO. (58): On or around July 17, 2017, San Juan Hills High School parent Keri Schneeweiss did not sign up her child up for the Prodigy Athletes SWAG program, but ultimately received the same services from San Juan Hills High School and Prodigy for football services.

OVER ACT NO. (59): On or about July 17, 2017, SEAN MCMANUS texted NYLA CRIDER to offer full funds to summer enrollees as long their paperwork was backdated to July 1, 2017.

OVER ACT NO. (60): On or about July 18, 2017, NYLA CRIDER texted SEAN MCMANUS Valiant Charter Schools could be receiving another 200-400 students from Prodigy Athletes.

OVER ACT NO. (61): On or about July 18, 2017, SEAN MCMANUS texted NYLA CRIDER to focus on recruiting as many of the athletic folks as she could.

OVER ACT NO. (62): On or about July 18, 2017, TROY KUKAHIKO texted NYLA CRIDER advising Valiant Charter Schools could pay him \$700 per participant which included Prodigy Athletes' \$500 fee and the \$200 Valiant was giving to the participating organization.

OVER ACT NO. (63): On or about July 18, 2017, TROY KUKAHIKO texted NYLA CRIDER suggesting he could write a check from Prodigy Athletes to the participating organization to pass through Valiant Charter School's \$200 contribution.

CHARGES (cont'd)

OVER ACT NO. (64): On or about July 18, 2017, NYLA CRIDER texted TROY KUKAHIKO that she would let him know how payments would be disbursed once she checked with SEAN MCMANUS.

OVER ACT NO. (65): On or about July 18, 2017, TROY KUKAHIKO texted NYLA CRIDER that John Glenn High School agreed to sign up for Prodigy Athletes' SWAG program.

OVER ACT NO. (66): On or about July 19, 2017, Assistant Principal Leonard Shryock from John Glenn High School emailed KALEHUA KUKAHIKO with questions about Prodigy Athletes' SWAG program, including the length of the program, the funding source of the \$200 payment to John Glenn High School's football team, and the curriculum involved.

OVER ACT NO. (67): On or about July 19, 2017, KALEHUA KUKAHIKO consulted with NYLA CRIDER and TROY KUKAHIKO on how to respond to Leonard Shryock's questions about SWAG.

OVER ACT NO. (68): On or about July 19, 2017, NYLA CRIDER approved KALEHUA KUKAHIKO's prepared response to Leonard Shryock's questions about SWAG.

OVER ACT NO. (69): On or about July 19, 2017, KALEHUA KUKAHIKO sent a letter to Leonard Shryock, as the Registrar and College Planning Advisor for Valiant Preparatory, in response to Leonard Shryock's questions about SWAG.

OVER ACT NO. (70): On or about July 19, 2017, KALEHUA KUKAHIKO in her letter to Leonard Shryock, Kukahiko explained SWAG was a summer only program and Prodigy Athletes was a "board approved" vendor of Valiant so whatever curriculum Prodigy Athletes integrated into the summer program met Valiant Charter School's requirements.

OVER ACT NO. (71): On or about July 19, 2017, KALEHUA KUKAHIKO in her letter to Leonard Shryock explained told Leonard Shryock that Prodigy Athletes Foundation was a non-profit corporation and was donating money back to the participating programs at their own discretion and the funds were not coming from a public charter school.

OVER ACT NO. (72): On or about July 19, 2017, NYLA CRIDER told Maureen Williams that, if she reached her bonus goal, she would be the highest paid employee at Valiant Charter Schools.

OVER ACT NO. (73): On or about July 19, 2017, TROY KUKAHIKO emailed George Malau'ulu, President of the AIGA Foundation about Prodigy Athletes' SWAG Program.

OVER ACT NO. (74): On or about July 21, 2017, TROY KUKAHIKO texted NYLA CRIDER to inquire if Prodigy Athletes was an approved vendor with Valiant Charter Schools.

OVER ACT NO. (75): On or about July 21, 2017, NYLA CRIDER texted Valiant Charter Schools' Vendor Relations Coordinator, Dana Hughes, and asked what needed to be done to approve Prodigy Athletes as a vendor.

CHARGES (cont'd)

OVER ACT NO. (76): On or about July 21, 2017, NYLA CRIDER told Dana Hughes that KALEHUA KUKAHIKO was the vendor contact for Prodigy Athletes and KALEHUA KUKAHIKO had already completed her live scan as an employee of Valiant Charter Schools.

OVER ACT NO. (77): On or about July 21, 2017, Dana Hughes texted NYLA CRIDER Prodigy Athletes was formally approved as a Valiant Charter Schools vendor.

OVER ACT NO. (78): On or about July 27, 2017, TROY KUKAHIKO texted NYLA CRIDER he was working on recruiting three other programs in addition to the three he already had.

OVER ACT NO. (79): On or about August 4, 2017, NYLA CRIDER texted SEAN MCMANUS to report Valiant Charter Schools had 1,410 total enrollments, with fall enrollments of 377.

OVER ACT NO. (80): On or about August 4, 2017, NYLA CRIDER and SEAN MCMANUS discussed paying referral fees to parents who referred students to Valiant Charter Schools.

OVER ACT NO. (81): On or about August 9, 2017, NYLA CRIDER texted SEAN MCMANUS a summary of Prodigy Athletes' summer enrollment numbers.

OVER ACT NO. (82): On or about August 9, 2017, NYLA CRIDER requested KALEHUA KUKAHIKO give her the SWAG Master Agreement's, transcripts and work samples Prodigy Athletes collected so she could determine how much Valiant Charter Schools owed each organization and TROY KUKAHIKO.

OVER ACT NO. (83): On or about August 9, 2017, KALEHUA KUKAHIKO texted NYLA CRIDER that Aaron Flowers (San Juan Hills High School) was suffering from A3 doubt and thought the \$200 he was promised per participant was too good to be true.

OVER ACT NO. (84): OVERT ACT NO. (100): On or about August 9, 2017, NYLA CRIDER texted SEAN MCMANUS about Coach Aaron Flowers' concerns the \$200 per participant he was promised was too good to be true.

OVER ACT NO. (85): OVERT ACT NO. (101): On or about August 9, 2017, SEAN MCMANUS texted NYLA CRIDER that he would write the check to Aaron Flowers in blood if he had to.

OVER ACT NO. (86): On or about August 9, 2017, SEAN MCMANUS texted NYLA CRIDER he wanted Valiant Charter Schools to have 2,500 students enrolled by next summer.

OVER ACT NO. (87): On or about August 10, 2017, NYLA CRIDER texted Aaron Flowers to advise she was getting ready to submit an invoice to obtain a check for the \$200 per student Valiant Charter Schools promised to pay to the San Juan Hills High School football program.

OVER ACT NO. (88): On or about August 10, 2017, NYLA CRIDER texted Aaron Flowers she wanted to bring the JASON SCHROCK, President of Valiant Charter Schools with her when they delivered the check to him.

CHARGES (cont'd)

OVER ACT NO. (89): On or about August 10, 2017, TROY KUKAHIKO submitted his first invoice to NYLA CRIDER for payment for SWAG.

OVER ACT NO. (90): On or about August 10, 2017, NYLA CRIDER asked TROY KUKAHIKO to adjust the Prodigy Athletes SWAG invoices to show they were for "Educational Services."

OVER ACT NO. (91): On or about August 12, 2017, KALEHUA KUKAHIKO emailed the corrected Prodigy Athletes SWAG invoices to NYLA CRIDER with the phrase "Educational Services".

OVER ACT NO. (92): On or about August 12, 2017, TROY KUKAHIKO and KALEHUA KUKAHIKO submitted a Prodigy Athletes SWAG invoice for \$71,000 to Valiant Charter Schools for 142 participants from San Juan Hills High School, John Glenn High School, Rancho Santa Margarita Pop Warner, AIGA Foundation, and Jesse Sapolu Foundation.

OVER ACT NO. (93): On or about August 13, 2017 TROY KUKAHIKO texted NYLA CRIDER to confirm the sports programs would receive \$200 from Prodigy Athletes and \$200 from Valiant Charter Schools per participant.

OVER ACT NO. (94): On or about August 13, 2017, TROY KUKAHIKO texted NYLA CRIDER he had a identified a coach who could bring another 100 kids to Prodigy Athletes' SWAG program by the following week.

OVER ACT NO. (95): On or about August 13, 2017, NYLA CRIDER texted TROY KUKAHIKO Valiant Charter Schools would continue to accept additional students into their summer program.

OVER ACT NO. (96): On or about August 15, 2017, NYLA CRIDER told TROY KUKAHIKO to backdate the Master Agreements for all Prodigy Athletes' SWAG participants to July 1, 2017, and get them to her by August 30, 2017.

OVER ACT NO. (97): On or about August 15, 2017, NYLA CRIDER emailed the Prodigy Athletes invoice she received from TROY KUKAHIKO and KALEHUA KUKAHIKO to RICHARD NGUYEN and SEAN MCMANUS.

OVER ACT NO. (98): On or about August 15, 2017, NYLA CRIDER asked RICHARD NGUYEN and SEAN MCMANUS to immediately pay Prodigy Athletes \$36,000 to cover the \$200 per participant Prodigy Athletes owed to the first group of organizations and to provide a little extra money for TROY KUKAHIKO.

OVER ACT NO. (99): OVERT ACT NO. (115): On or about August 16, 2017, RICHARD NGUYEN texted NYLA CRIDER and asked if SEAN MCMANUS approved the \$16,600 invoice she submitted for payment to San Juan Hills High School.

OVER ACT NO. (100): OVERT ACT NO. (116): On or about August 16, 2017, NYLA CRIDER responded to RICHARD NGUYEN "Yes" indicating SEAN MCMANUS approved the \$16,600 payment to San Juan Hills High School.

CHARGES (cont'd)

OVER ACT NO. (101): OVERT ACT NO. (117): On or about August 16, 2017, RICHARD NGUYEN told NYLA CRIDER from that point forward they would issue just one check to Prodigy Athletes to cover what Valiant Charter Schools owed Prodigy Athletes and the participating organizations.

OVER ACT NO. (102): OVERT ACT NO. (118): On or about August 16, 2017, RICHARD NGUYEN issued a \$16,600 check from Mosaica Online Academy of Southern California (the former corporate name of Valiant Academy of Southern California) to Stallion Booster Club (San Juan Hills High School) as payment for 83 Prodigy Athletes SWAG participants.

OVER ACT NO. (103): On or about August 18, 2017, RICHARD NGUYEN emailed SEAN MCMANUS and asked if the invoice was approved to immediately pay Prodigy Athletes \$36,000 to cover the \$200 per participant Prodigy Athletes owed the first group of organizations.

OVER ACT NO. (104): On or about August 18, 2017, SEAN MCMANUS emailed RICHARD NGUYEN and directed him and NYLA CRIDER to write the Prodigy Athletes SWAG invoice and send it to him with the unit math explained.

OVER ACT NO. (105): On or about August 22, 2017, NYLA CRIDER texted TROY KUKAHIKO she was in a meeting with the "high ups" and needed updated SWAG enrollment numbers.

OVER ACT NO. (106): On or about August 22, 2017, TROY KUKAHIKO texted NYLA CRIDER he had 30 enrollments from Toalei Talatana in San Diego and expected 70 more enrollments.

OVER ACT NO. (107): On or about August 22, 2017, TROY KUKAHIKO told NYLA CRIDER he also had 25 participants coming from Infinity Cheerleading later that day.

OVER ACT NO. (108): On or about August 22, 2017, NYLA CRIDER asked TROY KUKAHIKO to provide a Google Drive link so she could access and review the SWAG student registration documents.

OVER ACT NO. (109): On or about August 22, 2017, TROY KUKAHIKO provided NYLA Crider with a Google Drive link to the Prodigy Athletes SWAG student documents.

OVER ACT NO. (110): On or about August 22, 2017, NYLA CRIDER forwarded the Google Drive Link to JUSTIN SCHMITT and JASON SCHROCK and advised it was the link to all of the programs she brought to Valiant Charter Schools for the "summer program." NYLA CRIDER asked JUSTIN SCHMITT and JASON SCHROCK if they could verify the documents so she could begin to process Prodigy Athletes' invoices.

OVER ACT NO. (111): On or about August 22, 2017, NYLA CRIDER emailed KALEHUA KUKAHIKO and asked her to rewrite the Prodigy Athletes SWAG invoice for \$35,000 and use "Educational Services VALA" so she could issue a check the next day.

CHARGES (cont'd)

OVER ACT NO. (112): On or about August 22, 2017, NYLA CRIDER told KALEHUA KUKAHIKO Prodigy Athletes would need to create invoices for \$6,000 per month for the remainder of the money TROY KUKAHIKO was owed, plus any other students TROY KUKAHIKO could bring to Valiant Charter Schools before September 15, 2017.

OVER ACT NO. (113): On or about August 23, 2017, TROY KUKAHIKO texted NYLA CRIDER confirming SEAN MCMANUS was aware each program would receive \$200 from Valiant Charter Schools and \$200 from Prodigy Athletes (\$400 total) per participant.

OVER ACT NO. (114): On or about August 23, 2017, NYLA CRIDER confirmed over text with TROY KUKAHIKO each program would receive \$200 from Valiant Charter Schools and \$200 from Prodigy Athletes (\$400 total) per participant.

OVER ACT NO. (115): On or about August 23, 2017, TROY KUKAHIKO texted NYLA CRIDER the additional \$200 "Prodigy donation" was giving Valiant Charter Schools and Prodigy Athletes the competitive advantage in recruiting kids.

OVER ACT NO. (116): On or about August 23, 2017, TROY KUKAHIKO texted NYLA CRIDER he had a lot of "feet on the street" moving registrations that would bring Prodigy Athletes and Valiant Charter Schools a lot of money in the years to come.

OVER ACT NO. (117): On or about August 23, 2017, NYLA CRIDER texted TROY KUKAHIKO the only school with approved paperwork was San Juan Hills High School.

OVER ACT NO. (118): On or about August 24, 2017, Mosaica Online Academy of Los Angeles (the former corporate name of Valiant Academy of Los Angeles) issued Prodigy Athletes a check for \$36,000.

OVER ACT NO. (119): On or about August 28, 2017, RICHARD NGUYEN confirmed with NYLA CRIDER that Prodigy Athletes received the check for \$36,000.

OVER ACT NO. (120): On or about August 28, 2017, RICHARD NGUYEN texted NYLA CRIDER that Prodigy Athletes should submit an invoice every month for the remaining balance owed by Valiant Charter Schools.

OVER ACT NO. (121): On or about August 28, 2017, NYLA CRIDER emailed Aaron Flowers to schedule a time when she and JASON SCHROCK could personally deliver Valiant Charter School's payment to San Juan Hills High School.

OVER ACT NO. (122): On or about August 28, 2017, NYLA CRIDER texted TROY KUKAHIKO she was giving Prodigy Athletes' \$36,000 check to KALEHUA KUKAHIKO.

OVER ACT NO. (123): On or about August 29, 2017, Valiant Academy of Los Angeles issued Prodigy Athletes a check for \$36,000.

CHARGES (cont'd)

OVER ACT NO. (124): On or about August 30, 2017, TROY KUKAHIKO Prodigy Athletes issued an \$11,480 check to San Juan Hills High School ASB as payment for the San Juan Hills High School Prodigy Athletes SWAG participants.

OVER ACT NO. (125): On or about August 31, 2017, NYLA CRIDER asked JASON SCHROCK to bring a Memorandum of Understanding with him when they met with San Juan Hills High School football coach Aaron Flowers so Valiant Charter Schools could lock in San Juan Hills High School for the next 5 years.

OVER ACT NO. (126): On or about August 31, 2017, JASON SCHROCK texted NYLA CRIDER he would bring an MOU and asked Crider for the name of the program and what deal she gave them per student.

OVER ACT NO. (127): On or about August 31, 2017, NYLA CRIDER texted JASON SCHROCK the program name for the MOU was San Juan Hills High School and the deal she gave them was \$200 per student.

OVER ACT NO. (128): On or about August 31, 2017, NYLA CRIDER and JASON SCHROCK personally delivered a \$16,600 check from Valiant Charter Schools to San Juan Hills High School football coach Aaron Flowers.

OVER ACT NO. (129): On or about August 31, 2017 TROY KUKAHIKO obtained a \$4,340 cashier's check payable to Faatasi Le Atua, LLC, which was a corporation operated by Vincent Lobendahn, the football coach of John Glenn High School, as payment for the John Glenn High School Prodigy Athletes SWAG participants.

OVER ACT NO. (130): On or about August 31, 2017, TROY KUKAHIKO issued a \$1,360 check payable to Sam Tai.

OVER ACT NO. (131): On or about September 1, 2017, NYLA CRIDER gave Shannon Giese access to a shared Google Drive account with Prodigy Athletes and asked her to review the student registration documents Prodigy Athletes had collected for the Prodigy Athletes SWAG participants.

OVER ACT NO. (132): OVERT ACT NO. (148): On or about September 4, 2017, Shannon Giese texted NYLA CRIDER to ask if she should sign and date the Physical Education logs and Master Agreements for the Prodigy Athletes SWAG participants.

OVER ACT NO. (133): OVERT ACT NO. (149): On or about September 4, 2017, Shannon Giese texted NYLA CRIDER the end date on all of the Prodigy Athletes SWAG Master Agreements was August 31, 2017, and asked what she should do.

OVER ACT NO. (134): On or about September 4, 2017, NYLA CRIDER asked TROY KUKAHIKO to change the end dates on the Prodigy Athletes SWAG Master Agreements to reflect the day before the participant returned to their regular school and not the day when the student was not receiving services from Valiant Charter Schools.

OVER ACT NO. (135): On or about September 6, 2017, TROY KUKAHIKO issued a \$1,700 check payable to Sam Tai.

CHARGES (cont'd)

OVER ACT NO. (136): On or about September 10, 2017, TROY KUKAHIKO texted NYLA CRIDER he wouldn't have Carson High School's paperwork until September 15, 2017, despite the paperwork being dated 7/1/2017.

OVER ACT NO. (137): On or about September 10, 2017, NYLA CRIDER texted TROY KUKAHIKO he was approved to submit paperwork for Prodigy Athletes SWAG participants to Valiant Charter Schools by September 15 as long as the Master Agreements were dated July 1, 2017.

OVER ACT NO. (138): On or about September 13, 2017, Shannon Giese emailed NYLA CRIDER to advise the end date needed to be added to the Master Agreements Prodigy Athletes submitted for Infinity Cheerleading's SWAG participants.

OVER ACT NO. (139): On or about September 13, 2017, Shannon Giese emailed NYLA CRIDER to advise the paperwork Prodigy Athletes submitted for San Diego Fight Club's SWAG participants didn't include any Physical Education logs.

OVER ACT NO. (140): On or about September 13, 2017, NYLA CRIDER forwarded Shannon Giese's email about deficient Prodigy Athletes student registration files and paperwork to TROY KUKAHIKO.

OVER ACT NO. (141): On or about September 13, 2017, Shannon Giese sent a series of text messages to NYLA CRIDER containing photographs of what appeared to be edited student Master Agreements provided by Prodigy Athletes and asked if they were acceptable.

OVER ACT NO. (142): On or about September 13, 2017, NYLA CRIDER forwarded pictures of doctored Master agreements provided by Shannon Giese to SEAN MCMANUS for approval.

OVER ACT NO. (143): On or about September 14, 2017, Shannon Giese emailed NYLA CRIDER and TROY KUKAHIKO to express concern that Prodigy Athletes' SWAG Physical Education logs indicated elementary school children had performed an hour of weight lifting for at least 10 days each month (July, 2017 and August, 2017).

OVER ACT NO. (144): On or about September 14, 2017, Shannon Giese emailed TROY KUKAHIKO and NYLA CRIDER suggesting ten days of weight lifting for elementary school children, as described in the PE logs, appeared weird or unsafe for small children and asked TROY KUKAHIKO to change the PE logs.

OVER ACT NO. (145): On or about September 15, 2017, TROY KUKAHIKO emailed Shannon Giese, NYLA CRIDER, and SAM TAI to advise all student files were fixed and weight lifting was changed to plyometrics on all Physical Education logs for elementary school students.

OVER ACT NO. (146): On or about September 22, 2017, NYLA CRIDER emailed TROY KUKAHIKO and asked that he create an invoice for 28 Prodigy Athletes SWAG participants from the Mt. Helix Runnin Rebels football program.

OVER ACT NO. (147): On or about September 23, 2017, Shannon Giese sent a text message to NYLA CRIDER with a picture of a child's transcript dated August 23, 2017.

CHARGES (cont'd)

OVER ACT NO. (148): On or about September 23, 2017, Shannon Giese asked NYLA CRIDER if she was concerned a student transcript for a Prodigy Athletes SWAG participant was printed after the course had started.

OVER ACT NO. (149): On or about September 23, 2017, Shannon Giese emailed NYLA CRIDER and TROY KUKAHIKO to advise she completed her review of Prodigy Athletes SWAG student files and approved 16 students for Rancho Santa Margarita Pop Warner.

OVER ACT NO. (150): On or about September 28, 2017, RICHARD NGUYEN emailed SEAN MCMANUS and cc'd NYLA CRIDER to inquire if the Prodigy Athletes' invoices needed to say educational or instructional services.

OVER ACT NO. (151): On or about September 28, 2017, SEAN MCMANUS replied to RICHARD NGUYEN and said to ensure the Prodigy Athletes invoices stated they were for educational and instructional services.

OVER ACT NO. (152): On or about Sept 29, 2017, Valiant Academy of Southern California issued Prodigy Athletes a check for \$420.

OVER ACT NO. (153): On or about October 4, 2017, TROY KUKAHIKO sent an invoice to NYLA CRIDER for 32 Prodigy Athletes SWAG participants from San Diego Fight Club.

OVER ACT NO. (154): On or about October 4, 2017, NYLA CRIDER texted SEAN MCMANUS that Prodigy Athletes was going to sign up a few more softball teams that week.

OVER ACT NO. (155): On or about October 4, 2017, SEAN MCMANUS responded to NYLA CRIDER and asked if the softball teams Prodigy Athletes was still signing up were for the summer.

OVER ACT NO. (156): On or about October 4, 2017, NYLA CRIDER confirmed to SEAN MCMANUS that the softball teams Prodigy Athletes was still signing up were for the summer.

OVER ACT NO. (157): On or about October 4, 2017, SEAN MCMANUS responded to NYLA CRIDER "K."

OVER ACT NO. (158): On or about October 4, 2017, NYLA CRIDER texted SEAN MCMANUS to confirm "we can still accept it for this summer, right?"

OVER ACT NO. (159): On or about October 4, 2017, SEAN MCMANUS replied to NYLA CRIDER "yes" they would still accept kids for summer 2017.

OVER ACT NO. (160): On or about October 8, 2017, NYLA CRIDER emailed SEAN MCMANUS and RICHARD NGUYEN with copies of Prodigy Athletes' SWAG invoices for \$200 per student for Mt. Helix Runnin Rebels, Rancho Santa Margarita Pop Warner, Sapolu Youth Foundation, Power Surge, American Elite Sports, John Glenn High School, Infinity Cheerleading, SD Fight Club, and Be the One.

CHARGES (cont'd)

OVER ACT NO. (161): On or about October 8, 2017, NYLA CRIDER emailed SEAN MCMANUS and RICHARD NGUYEN advising Shannon Giese had gone through all of the Prodigy Athletes SWAG paperwork and signed off on all the work samples.

OVER ACT NO. (162): On or about October 8, 2017, NYLA CRIDER emailed SEAN MCMANUS and RICHARD NGUYEN with an invoice from Prodigy Athletes for \$105,000 for 210 new SWAG participants recruited between August 30, 2017, and October 8, 2017.

OVER ACT NO. (163): On or about October 16, 2017, TROY KUKAHIKO emailed Shannon Giese and NYLA CRIDER to advise 46 students from Carson High School had been added to the shared Google Drive folder for review.

OVER ACT NO. (164): On or about October 26, 2017, TROY KUKAHIKO texted NYLA CRIDER advising AIGA was one of the groups bringing a lot of students into the SWAG program.

OVER ACT NO. (165): On or about October 26, 2017, TROY KUKAHIKO asked if they could market Valiant Charter Schools as a sponsor or if Valiant Charter Schools could provide a gift to the players at AIGA's January 2018, Polynesian All American Bowl event.

OVER ACT NO. (166): On or about October 31, 2017, NYLA CRIDER texted SEAN MCMANUS to ask if TROY KUKAHIKO could bring another 300 summer school kids to Valiant Charter Schools.

OVER ACT NO. (167): On or about October 31, 2017, SEAN MCMANUS texted NYLA CRIDER keep them coming when asked if TROY KUKAHIKO could bring 300 more summer school kids.

OVER ACT NO. (168): On or about October 31, 2017, NYLA CRIDER texted SEAN MCMANUS she thought "JASON" SCHROCK said summer enrollment was closing.

OVER ACT NO. (169): On or about October 31, 2017, SEAN MCMANUS texted NYLA CRIDER "it's fine we'll take them" in response to bringing in more summer 2017, students.

OVER ACT NO. (170): On or about October 31, 2017, Shannon Giese received a paycheck from Valiant Charter Schools that was \$700 more than her base rate.

OVER ACT NO. (171): On or about October 31, 2017, NYLA CRIDER received a \$5,000 bonus from Valiant Charter Schools.

OVER ACT NO. (172): On or about November 1, 2017, Valiant Academy of Southern California issued a check to Prodigy Athletes for \$26,000.

OVER ACT NO. (173): On or about November 3, 2017, Valiant Academy of Southern California issued a check to Prodigy Athletes for \$75,200.

CHARGES (cont'd)

OVER ACT NO. (174): On or about November 4, 2017, Maureen Williams texted NYLA CRIDER, "I had the weirdest dreams last night! One was about us growing all Sean's schools. I was running all the Facebook campaigns and you were running around my office drinking champagne throwing money everywhere yelling I love bonuses."

OVER ACT NO. (175): On or about November 4, 2017, NYLA CRIDER sent forwarded the text from Maureen Williams text message about her dream to SEAN MCMANUS.

OVER ACT NO. (176): On or about November 4, 2017, SEAN MCMANUS responded to NYLA Crider saying "Wow sounds like a party I want to go to" in response the text message about Maureen William's dream.

OVER ACT NO. (177): On or about November 6, 2017, TROY KUKAHIKO issued a \$6,200 check payable to Faatasi Le Atua, LLC, which was a corporation operated by Vincent Lobendahn, the John Glenn High School football coach.

OVER ACT NO. (178): On or about November 8, 2017, NYLA CRIDER and SEAN MCMANUS texted each other about the payment structure for Valiant Charter School's 2018 summer session.

OVER ACT NO. (179): On or about November 8, 2017 SEAN MCMANUS told NYLA CRIDER he wanted to make 2018 summer session as cheap as possible but believed the cat was out of the bag with TROY KUKAHIKO at \$500 "per kid."

OVER ACT NO. (180): On or about November 8, 2017, NYLA CRIDER texted TROY KUKAHIKO advising she had confirmed with SEAN MCMANUS that Valiant Charter Schools would pay \$200 to the school and \$400 to Prodigy Athletes for each student Prodigy Athletes registered in Summer 2018.

OVER ACT NO. (181): On or about November 10, 2017, Valiant Academy of Southern California issued a check to Prodigy Athletes for \$5,000.

OVER ACT NO. (182): On or about November 10, 2017, TROY KUKAHIKO purchased a \$4,480 cashier's check payable to Mt. Helix Runnin Rebels as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (183): On or about November 10, 2017, TROY KUKAHIKO purchased a \$5,120 cashier's check payable to San Diego Fight Club as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (184): On or about November 10, 2017, TROY KUKAHIKO purchased a \$2,560 cashier's check payable to Savaii Seau who operated Be the One.

OVER ACT NO. (185): On or about November 10, 2017, TROY KUKAHIKO purchased a \$8,000 cashier's check payable to American Elite Sports as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (186): On or about November 10, 2017, TROY KUKAHIKO purchased a \$7,360 cashier's check payable to Power Surge as payment for their Prodigy Athletes SWAG participants.

CHARGES (cont'd)

OVER ACT NO. (187): On or about November 10, 2017, TROY KUKAHIKO purchased a \$24,080 cashier's check payable to Toalei Talataina as agent fees for recruiting organizations to Prodigy Athletes' SWAG.

OVER ACT NO. (188): On or about November 10, 2017, TROY KUKAHIKO purchased a \$4,000 cashier's check payable to Infinity Cheerleading as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (189): On or about November 12, 2017, Shannon Giese emailed TROY KUKAHIKO and NYLA CRIDER she was reviewing Prodigy Athletes SWAG student files for Carson High School.

OVER ACT NO. (190): On or about November 13, 2017, JUSTIN SCHMITT texted NYLA CRIDER inquiring about the student count for summer.

OVER ACT NO. (191): On or about November 13, 2017, NYLA CRIDER texted JUSTIN SCHMITT they had 1,518 students, not including Prodigy Athletes because Shannon Giese was still reviewing their files for the prior summer.

OVER ACT NO. (192): On or about November 14, 2017, NYLA CRIDER emailed Shannon Giese to ask if there were any more student files from Prodigy Athletes that she had finished reviewing.

OVER ACT NO. (193): On or about November 15, 2017, Shannon Giese emailed NYLA CRIDER with a link to a Prodigy Athletes SWAG file that she finished reviewing.

OVER ACT NO. (194): On or about November 15, 2017, NYLA CRIDER emailed JUSTIN SCHMITT to confirm which email she was supposed to send the "summer docs" to.

OVER ACT NO. (195): On or about November 15, 2017, Shannon Giese received a paycheck from Valiant Charter Schools which was \$800 more than her base rate.

OVER ACT NO. (196): On or about November 15, 2017, NYLA CRIDER received a \$5,000 bonus from Valiant Charter Schools.

OVER ACT NO. (197): On or about November 16 2017, SEAN MCMANUS texted NYLA CRIDER directing her not to put Viva folks on anyone's roster except Shannon Giese's because others were getting paid to do nothing.

OVER ACT NO. (198): On or about November 20, 2017, NYLA CRIDER emailed the link with the recently reviewed Prodigy Athletes SWAG files to JUSTIN SCHMITT at enrollment@a3ed.org.

OVER ACT NO. (199): On or about November 26, 2017, JUSTIN SCHMITT emailed NYLA CRIDER to ask where they stood on the rest of the Prodigy Athletes SWAG files.

OVER ACT NO. (200): On or about November 26, 2017, JUSTIN SCHMITT emailed NYLA CRIDER and said they needed to have the Prodigy Athletes SWAG files verified and added to a spreadsheet as soon as possible because Valiant Charter Schools' P1 report was due very soon.

CHARGES (cont'd)

OVER ACT NO. (201): On or about November 27, 2017, NYLA CRIDER emailed TROY KUKAHIKO to see if all of the Prodigy Athletes SWAG Master Agreements with problems had been redone.

OVER ACT NO. (202): On or about November 27, 2017, NYLA CRIDER emailed TROY KUKAHIKO to see if he was ready to have Shannon Giese review the Prodigy Athletes SWAG files.

OVER ACT NO. (203): On or about November 27, 2017, TROY KUKAHIKO told NYLA CRIDER there were 48 Prodigy Athletes SWAG Master Agreements that were redone.

OVER ACT NO. (204): On or about November 27, 2017, NYLA CRIDER emailed Shannon Giese to request she review the Prodigy Athletes SWAG files again.

OVER ACT NO. (205): On or about November 27, 2017, Shannon Giese emailed TROY KUKAHIKO and NYLA CRIDER to advise she was reviewing Prodigy Athletes' SWAG files and noticed Master Agreements had different colored ink.

OVER ACT NO. (206): On or about November 27, 2017, Shannon Giese emailed TROY KUKAHIKO and NYLA CRIDER to advise she was reviewing Prodigy Athletes' SWAG files and noticed Master Agreements were partially typed and partially handwritten.

OVER ACT NO. (207): On or about November 27, 2017, Shannon Giese emailed TROY KUKAHIKO and NYLA CRIDER to advise she was reviewing Prodigy Athletes' SWAG files and noticed student progress reports were collected instead of transcripts.

OVER ACT NO. (208): On or about November 27, 2017, Shannon Giese emailed TROY KUKAHIKO that all his Prodigy Athletes SWAG files needed to be fixed no later than November 29, 2017, or Valiant Charter Schools would not be able to pay Prodigy Athletes for those students.

OVER ACT NO. (209): On or about November 27, 2017, TROY KUKAHIKO emailed NYLA CRIDER notifying her he anticipated 300 "or so" new Prodigy Athletes SWAG student files to come in that week.

OVER ACT NO. (210): On or about November 27, 2017, TROY KUKAHIKO emailed NYLA CRIDER asking if the timeline had changed or could he submit 300 "or so" new Prodigy Athletes SWAG student files.

OVER ACT NO. (211): On or about November 27, 2017, NYLA CRIDER texted TROY KUKAHIKO advising the deadline to submit student files for Summer Session 2017, was November 29, 2017.

OVER ACT NO. (212): On or about November 29, 2017, NYLA CRIDER texted Amanda Keagan, Deana Zamiska, and Shannon Giese to advise she asked Shannon Giese to review the 700 (Prodigy Athletes SWAG) student files from summer and Shannon Giese would need an extension on her other projects since NYLA CRIDER was using Shannon Giese for the summer files.

CHARGES (cont'd)

OVER ACT NO. (213): On or about December 3, 2017, NYLA CRIDER texted Shannon Giese advising she was going to pay her \$500 extra during each of the next two pay periods for her work reviewing the 700 Prodigy Athletes SWAG files.

OVER ACT NO. (214): On or about December 6, 2017, Prodigy Athletes invoiced Valiant Charter Schools for 44 SWAG participants from Carson High School.

OVER ACT NO. (215): On or about December 7, 2017, Shannon Giese emailed NYLA CRIDER with an updated count of approved student files for Prodigy Athletes SWAG.

OVER ACT NO. (216): On or about December 8, 2017, TROY KUKAHIKO filed a Statement of Information with the California Secretary of State on behalf of Prodigy Athletes Foundation.

OVER ACT NO. (217): On or about December 8, 2017, TROY KUKAHIKO was identified as the CEO on the Prodigy Athletes Statement of Information filed with the California Secretary of State.

OVER ACT NO. (218): On or about December 8, 2017, KALEHUA KUKAHIKO was identified as the Secretary on the Prodigy Athletes Statement of Information filed with the California Secretary of State.

OVER ACT NO. (219): On or about December 11, 2017, Shannon Giese texted NYLA CRIDER advising she finished reviewing the Prodigy Athletes SWAG files.

OVER ACT NO. (220): On or about December 12, 2017, NYLA CRIDER emailed RICHARD NGUYEN to request payment for Prodigy Athletes.

OVER ACT NO. (221): On or about December 13, 2017, Valiant Academy of Southern California issued a check to Prodigy Athletes for \$12,000.

OVER ACT NO. (222): On or about December 15, 2017, Shannon Giese received a paycheck from Valiant Charter Schools which was \$500 more than her base rate.

OVER ACT NO. (223): On or about December 17, 2017, NYLA CRIDER forwarded Shannon Giese's revised numbers of approved Prodigy Athletes SWAG students per participating organization to TROY KUKAHIKO.

OVER ACT NO. (224): On or about December 17, 2017, TROY KUKAHIKO made a note in his phone documenting the differences between the Prodigy Athletes SWAG students Shannon Giese originally approved and the revised numbers.

OVER ACT NO. (225): On or about December 18, 2017, TROY KUKAHIKO emailed NYLA CRIDER invoices for the 3rd round of organizations recruited by Prodigy Athletes SWAG which included Carson High School, USA Softball, Gold Medal Marketing, Steele Canyon High School, San Diego Fight Club, SDFNL, & Be the One.

CHARGES (cont'd)

OVER ACT NO. (226): On or about December 18, 2017, TROY KUKAHIKO submitted a Prodigy Athletes SWAG invoice for \$90,500 to Valiant Charter Schools to cover the \$500 payment per student Valiant Charter Schools owed Prodigy Athletes for 181 new SWAG participants.

OVER ACT NO. (227): On or about December 18, 2017, NYLA CRIDER forwarded TROY KUKAHIKO's email with the Prodigy Athletes SWAG invoices for Prodigy Athletes' 3rd round of organizations to RICHARD NGUYEN.

OVER ACT NO. (228): On or about December 18, 2017, NYLA CRIDER emailed RICHARD NGUYEN stating the invoices provided by Prodigy Athletes were the rest of their invoices for the Prodigy Athletes SWAG summer program.

OVER ACT NO. (229): On or about December 18, 2017, NYLA CRIDER emailed RICHARD NGUYEN stating all of the Prodigy files had been reviewed by Shannon Giese and sent to JUSTIN SCHMITT for review.

OVER ACT NO. (230): On or about December 18, 2017, TROY KUKAHIKO obtained a \$6,000 cashier's check payable to Tom and NYLA CRIDER.

OVER ACT NO. (231): On or about December 26, 2017, Valiant Academy of Southern California issued Prodigy Athletes a check for \$9,800.

OVER ACT NO. (232): On or about December 29, 2017, Shannon Giese received a paycheck from Valiant Charter Schools which was \$500 more than her base rate.

OVER ACT NO. (233): On or about January 1, 2018, NYLA CRIDER received a \$2,500 bonus from Valiant Charter Schools.

OVER ACT NO. (234): On or about January 6, 2018, SEAN MCMANUS, NYLA CRIDER, TROY KUKAHIKO, and KALEHUA KUKAHIKO attended the AIGA Polynesian American Bowl at Carson High School.

OVER ACT NO. (235): On or about January 6, 2018, SEAN MCMANUS, NYLA CRIDER, & TROY KUKAHIKO posed for a photo with George Malau'ulu the President of AIGA.

OVER ACT NO. (236): On or about January 12, 2018, Shannon Giese received a paycheck from Valiant Charter Schools which was \$500 more than her base rate.

OVER ACT NO. (237): On or about January 22, 2018, Valiant Academy of Southern California issued Prodigy Athletes a check for \$105,600.

OVER ACT NO. (238): On or about January 23, 2018, Valiant Academy of Southern California issued Prodigy Athletes a check for \$12,000.

OVER ACT NO. (239): On or about January 26, 2018, TROY KUKAHIKO purchased a \$12,600 cashier's check payable to USA Softball as payment for their Prodigy Athletes SWAG participants.

CHARGES (cont'd)

OVER ACT NO. (240): On or about January 26, 2018, TROY KUKAHIKO purchased a \$6,233.76 cashier's check payable to American Elite Sports as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (241): On or about January 26, 2018, TROY KUKAHIKO purchased a \$1,400 cashier's check payable to Ruben Pena (SDFNL) as payment for their Prodigy Athletes SWAG participants.

OVER ACT NO. (242): On or about January 26, 2018, TROY KUKAHIKO purchased a \$3,870 cashier's check payable to Sam Tai.

OVER ACT NO. (243): On or about January 26, 2018, TROY KUKAHIKO purchased a \$10,047 cashier's check payable to Toalei Talataina as agent fees for recruiting organizations to Prodigy Athletes' SWAG program.

OVER ACT NO. (244): On or about January 26, 2018 TROY KUKAHIKO purchased a \$980 cashier's check payable to Savaii Seau as payment for his Prodigy Athletes SWAG participants.

OVER ACT NO. (245): On or about January 26, 2018 TROY KUKAHIKO purchased a \$15,500 cashier's check payable to AIGA Foundation.

OVER ACT NO. (246): On or about January 30, 2018 NYLA CRIDER texted TROY KUKAHIKO asking that he obtain a W9 form from the San Juan Hills High School Booster Club because Valiant Charter Schools needed to send them a 1099 form.

OVER ACT NO. (247): On or about February 5, 2018 TROY KUKAHIKO emailed NYLA CRIDER (at her Excel academy email) suggesting they position Prodigy Athletes as "simply a vendor" for Valiant Charter Schools and, with exception of a few organizations, not bring up Valiant Charter Schools' donation to the organizations.

OVER ACT NO. (248): On or about February 15, 2018, NYLA CRIDER received a \$2,500 bonus from Valiant Charter Schools.

OVER ACT NO. (249): On or about February 16, 2018 TROY KUKAHIKO emailed NYLA CRIDER to discuss outstanding invoices and payments owed to Prodigy Athletes.

OVER ACT NO. (250): On or about February 20, 2018 TROY KUKAHIKO emailed NYLA CRIDER with Prodigy Athletes SWAG invoices totaling \$93,000.

OVER ACT NO. (251): In or around and between December 23, 2017, JUSTIN SCHMITT submitted ADA for P1 for Valiant Academy Southern California , which included students brought in by Prodigy Athletes.

OVER ACT NO. (252): On or about February 23, 2018 NYLA CRIDER texted Deanna Zamiska they would need a lot of teachers and anticipated Prodigy Athletes would bring 1,000 students to Valiant Charter Schools for summer 2018.

CHARGES (cont'd)

OVER ACT NO. (253): On or about February 23, 2018, Deanna Zamiska texted NYLA CRIDER and asked if Prodigy Athletes needed "actual" teachers and said she thought they just collected the Physical Education log.

OVER ACT NO. (254): On or about February 23, 2018, NYLA CRIDER texted Deanna Zamiska she was working on it and may need a few teachers for Prodigy Athletes for 2018.

OVER ACT NO. (255): On or about February 28, 2018, NYLA CRIDER received a \$2,500 bonus from Valiant Charter Schools.

OVER ACT NO. (256): On or about March 9, 2018, KALEHUA KUKAHIKO texted NYLA CRIDER a copy of a proposed flyer for Prodigy Athletes for an SAT/ACT prep course for summer 2018.

OVER ACT NO. (257): On or about March 9, 2018, NYLA CRIDER texted KALEHUA KUKAHIKO she was reviewing the proposed flyer for Prodigy Athletes' SAT/ACT prep course for summer 2018.

OVER ACT NO. (258): On or about March 9, 2018, KALEHUA KUKAHIKO texted NYLA CRIDER asking for NYLA to review the proposed flyer for Prodigy Athletes' SAT/ACT prep course for summer 2018.

OVER ACT NO. (259): On or about March 9, 2018, NYLA CRIDER texted SEAN MCMANUS and JUSTIN SCHMITT a copy of Prodigy Athletes' SAT/ACT prep course flyer for summer 2018.

OVER ACT NO. (260): On or about March 9, 2018, NYLA CRIDER texted SEAN MCMANUS and JUSTIN SCHMITT asking if the wording on Prodigy Athletes' SAT/ACT prep course flyer for summer 2018 was ok because it stated Prodigy Athletes would pay participating programs \$100 per registrant.

OVER ACT NO. (261): On or about March 9, 2018, SEAN MCMANUS texted NYLA CRIDER he would review the Prodigy Athletes' SAT/ACT prep course flyer for summer 2018 and call her soon.

OVER ACT NO. (262): On or about March 10, 2018, TROY KUKAHUKO texted NYLA CRIDER with a copy of Prodigy Athletes' SAT/ACT prep course flyer for summer 2018.

OVER ACT NO. (263): On or about March 12, 2018, TROY KUKAHIKO emailed RICHARD NGUYEN and provided copies of outstanding invoices from Prodigy Athletes and a payment summary document.

OVER ACT NO. (264): On or about March 15, 2018, NYLA CRIDER received a \$2,500 bonus from Valiant Charter School.

OVER ACT NO. (265): On or about March 20, 2018, Valiant Academy of Southern California issued Prodigy Athletes a check for \$93,000.

OVER ACT NO. (266): On or about March 20, 2018, NYLA CRIDER again inquired about Prodigy Athletes' SAT/ACT prep course flyer for summer 2018 with SEAN MCMANUS and JUSTIN SCHMITT via text.

CHARGES (cont'd)

OVER ACT NO. (267): On or about March 20, 2018, JUSTIN SCHMITT texted NYLA CRIDER and SEAN MCMANUS suggesting the Prodigy Athletes' SAT/ACT prep course flyer for summer 2018 reference California Academy of Sports Science (CASS) if it was being offered in the counties CASS served because it would be a better brand for the program.

OVER ACT NO. (268): On or about March 21, 2018, , and after a search warrant was executed at the home of TROY KUKAHIKO and KALEHUA KUKAHIKO NYLA CRIDER texted Robin Foyle and requested she remove KALEHUA KUKAHIKO's name from Prodigy Athletes on the Valiant Prep vendor information page.

OVER ACT NO. (269): On or about March 21, 2018, NYLA CRIDER texted SEAN MCMANUS advising she spoke to KALEHUA KUKAHIKO regarding the search warrant executed at her house.

OVER ACT NO. (270): On or about March 21, 2018, NYLA CRIDER texted SEAN MCMANUS that KALEHUA KUKAHIKO was asked about Average Daily Attendance during the search warrant.

OVER ACT NO. (271): On or about March 22, 2018, NYLA CRIDER advised Robin Foyle the contact name for Prodigy Athletes on Valiant Charter Schools' vendor page should read TROY LAU, which is an AKA for TROY [KUKAHIKO], with a contact email of prodigyathletes@gmail.com.

OVER ACT NO. (272): On or about March 22, 2018, NYLA CRIDER texted Robin Foyle that she needed to make the change to Prodigy Athlete's contact information on the Valiant Charter Schools' vendor information page that day.

OVER ACT NO. (273): On or about March 27, 2018, NYLA CRIDER texted SEAN MCMANUS she was taking care of Master Agreements from last summer.

OVER ACT NO. (274): On or about April 10-11, 2018, NYLA CRIDER asked her subordinate Shannon Giese to sign student master agreements as the supervising teacher for Prodigy Athletes' SWAG students for summer 2017.

OVER ACT NO. (275): On or about April 10-11, 2018, NYLA CRIDER asked her subordinate, Valiant Charter Schools Education Coach Andrea Franco to signed 563 Master Agreements as the supervising teacher for Prodigy Athletes' SWAG students for summer 2017.

OVER ACT NO. (276): On or about April 10-11, 2018, Andrea Franco signed 563 Master Agreements as the supervising teacher for Prodigy Athletes' SWAG students for summer 2017 at the direction of her boss, NYLA CRIDER.

OVER ACT NO. (277): On or about April 10-11, 2018, Andrea Franco texted NYLA CRIDER she spent between 35 and 55 seconds per Master Agreement she signed for Prodigy Athletes' SWAG students.

OVER ACT NO. (278): On or about April 10-11, 2018, NYLA CRIDER did not inform Andrea Franco that search warrants had been executed at the home of KALEHUA KUKAHIKO and TROY KUKAHIKO.

CHARGES (cont'd)

OVER ACT NO. (279): On or about April 14, 2018, NYLA CRIDER asked TROY KUKAHIKO if he was able to obtain additional information from the coaches for last summer so Valiant Charter Schools could prove SWAG happened during the summer.

OVER ACT NO. (280): Between July 1 2017 and August 31, 2017 credentialed teachers employed by Valiant Charter School and teachers and Prodigy Athletes teachers had no contact with students from sports programs recruited and enrolled by TROY KUKAHIKO and Prodigy Athletes.

COUNT 5 - CONSPIRACY TO COMMIT A CRIME

On or about and between January 1, 2016 and February 11, 2019, SEAN JOSEPH MCMANUS, JUSTIN KENT SCHMITT, JASON ALAN SCHROCK, ELI RALPH JOHNSON, RICHARD BA NGUYEN, NYLA JUNE CRIDER, STEVEN BRAIN ZANT, and ROBERT JOHN WILLIAMS did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Grand Theft, PC 487, Misrepresenting charter school services to obtain additional public funds Marketing, in violation of PENAL CODE SECTION 182(a)(1).

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

The object of the conspiracy was to collect public funds from the state for charter school enrollments they were not lawfully entitled to collect. These include a variety of measures:

- Conspirators knowingly collected public funds for large amounts of students for “summer school” through a multitrack attendance calendar, claiming Track A, started on July 1 and ended 175 days later, but in reality Conspirators openly advertised and intentionally enrolled students in school for 40 days only, and claimed to the State that students all voluntarily withdrew before 175 days. To increase profit from Track A enrollments, Conspirators did not assign teachers to Track A at lawful pupil to teacher ratios.
- Conspirators also enrolled children for Track A from pre-existing youth programs such as sports teams, camps, gyms, private schools both religious and secular, and private enrichment centers. Conspirators paid pre-existing youth programs for student report cards and enrollment documentation and used the documentation as the basis to enroll students in public charter schools. Conspirators provided limited to no services to the pre-existing programs and did not assign teachers at lawful pupil to teacher ratios. Conspirators paid the pre-existing youth programs a fraction of what was received in public funds from the state for 40 days of enrollment.
- Conspirators also operated an online and homeschool program that operated both during the regular school year and over summer. Conspirators knowingly obtained additional ADA funding for full year students over summer, by un-enrolling them in their charter school, and enrolling them in a separate “sister” charter school without the student’s or parent’s knowledge.

CHARGES (cont'd)

- Conspirators knowingly manipulated invoices to come into compliance with the 80% / 40% spending requirements, required for 100% funding they received through the charter schools' non-classroom based funding determination approved by the State Board of Education. Conspirators also knowingly manipulated how teachers were assigned across charter schools to feign compliance with the pupil to teacher ratio for funding determinations.
- Conspirators evaded oversight by knowingly manipulating financial and programmatic information given to auditors. Conspirators also changed auditors when questioned about operations.
- Conspirators evaded oversight by courting and seeking charter school authorization from small school districts across California who were suffering declining enrollment and budget woes. Conspirators provided their authorizers significant additional state funding and services in the form of oversight fees. Conspirators knowingly approached these small districts because they were not in a financial position to challenge Conspirators enrollment practices through oversight and could not afford the revocation process.
- Conspirators evaded oversight by identifying subordinate administrators as the CEO of the charter schools on public documents and as the contact person to state agencies to hide the leadership of the charter schools.

OVERT ACT NO. (1): On or about and between July 1, 2017 and June 30, 2018, SEAN MCMANUS and JASON SCHROCK, through charter schools they controlled, collected \$7,083 per ADA for a student in grade span K-3, collected \$7,189 per ADA for a student in grade span 4-6, collected \$7,403 per ADA for a student in grade span 7-8, collected \$8,578 per ADA for a student in grade span 9-12.

OVERT ACT NO. (2): On or about and between July 1, 2017 and June 30, 2018, SEAN MCMANUS and JASON SCHROCK, through charter schools they controlled, collected proportional ADA for summer school at or around \$40 per day.

OVERT ACT NO. (3): On or about and between July 1, 2018 and May 2019, SEAN MCMANUS and JASON SCHROCK, through charter schools they controlled, requested public funds at the following rates \$8,235 per ADA for a student in grade span K-3, collected \$7,571 per ADA for a student in grade span 4-6, collected \$7,796 per ADA for a student in grade span 7-8, collected \$9,269 per ADA for a student in grade span 9-12.

OVERT ACT NO. (4): On or about and between July 1, 2018 and February 2019, SEAN MCMANUS and JASON SCHROCK, through charter schools they controlled, collected proportional ADA for summer school at or around \$40 per day.

OVERT ACT NO. (5): On or about and between January 2017 and June 2018, SEAN MCMANUS was primarily concerned with increasing enrollment numbers for the charter schools.

OVERT ACT NO. (6): On or about April 24, 2017, SEAN MCMANUS and JASON SCHROCK hired NYLA CRIDER to expand enrollment in Valiant Charter Schools.

OVERT ACT NO. (7): On or about April 24, 2017, SEAN MCMANUS directed NYLA CRIDER via text to get going on summer school.

CHARGES (cont'd)

OVERT ACT NO. (8): On or about May 8, 2017, JASON SCHROCK and SEAN MCMANUS explained to NYLA CRIDER via text that a master agreement, birth certificate and proof of address was all that was needed to enroll kids in the summer program for Valiant Charter Schools.

OVERT ACT NO. (9): On or about June 8, 2017, SEAN MCMANUS texted NYLA CRIDER to recruit California Virtual Academy teachers and their friends with student rosters to come to Valiant to increase their enrollment numbers.

OVERT ACT NO. (10): On or about July 2, 2017, NYLA CRIDER reported to SEAN MCMANUS Valiant had 978 students.

OVERT ACT NO. (11): On or about July 2, 2017, SEAN MCMANUS texted NYLA CRIDER in response to 978 students and said "the ladies are just killing it" and "Let's keep rocking."

OVERT ACT NO. (12): On or about July 7, 2017, SEAN MCMANUS texted NYLA CRIDER to inquire about Valiant Charter Schools' enrollment numbers.

OVERT ACT NO. (13): On or about July 7, 2017, NYLA Crider responded to SEAN MCMANUS via text and reported enrollment was 1,039.

OVERT ACT NO. (14): On or about July 12, 2017, SEAN MCMANUS gave NYLA CRIDER an immediate \$25,000 raise and set enrollment benchmarks for bonuses up to an additional \$30,000.

OVERT ACT NO. (15): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER asking about Valiant's enrollment numbers.

OVERT ACT NO. (16): On or about July 13, 2017, NYLA CRIDER reported to SEAN MCMANUS via text that Valiant's enrollment was 1,224 but would increase once the high school athletes came in.

OVERT ACT NO. (17): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER "go hard" for the next six weeks and make sure all documents were backdated to July 1, 2017.

OVERT ACT NO. (18): On or about July 13, 2017, NYLA CRIDER texted SEAN MCMANUS "I will" in response to SEAN MCMANUS's direction to "go hard" and to ensure the documents were backdated to July 1, 2017.

OVERT ACT NO. (19): On or about November 8, 2017 SEAN MCMANUS told NYLA CRIDER he wanted to make 2018 summer session as cheap as possible.

OVERT ACT NO. (20): On or about November 13, 2017, JUSTIN SCHMITT texted NYLA CRIDER inquiring about the student count for summer.

CHARGES (cont'd)

OVERT ACT NO. (21): On or about November 13, 2017, NYLA CRIDER texted JUSTIN SCHMITT they had 1,518 students, not including Prodigy Athletes because Shannon Giese was still reviewing their files for the prior summer.

OVERT ACT NO. (22): On or about November 15, 2017, NYLA CRIDER received a \$5,000 bonus from Valiant Charter Schools.

HAVING LESS THAN 175 DAYS IN A TRACK

OVERT ACT NO. (23): On or about and between July 1, 2017 and August 31, 2017, SEAN MCMANUS, JASON SCHROCK, JUSTIN SCHMITT, and NYLA CRIDER advertised to the public that A3 controlled charter schools offered a summer school only program less than 175 days.

OVERT ACT NO. (24): On or about and between July 1, 2018 and August 31, 2018 SEAN MCMANUS and JASON SCHROCK advertised to the public that A3 controlled charter schools offered a summer school only program less than 175 days.

OVERT ACT NO. (25): On or about and between January 1, 2015 and May 2019, ELI JOHNSON and JUSTIN SCHMITT proposed to small school districts that as a benefit for authorizing charter schools, the charter schools would provide free summer school by enrolling district students into the charter schools for less than 175 days.

OVERT ACT NO. (26): On or about and between January 1, 2017 and May 2019, SEAN MCMANUS, and JASON SCHROCK directed Luiz Rigney to collect enrollment paperwork to enroll students from traditional public school football teams during the summer with intent for them to enroll in a charter school for less than 175 days.

OVERT ACT NO. (27): On or about and between January 1, 2017 and May 2019, SEAN MCMANUS, and JASON SCHROCK directed Scott Rungworth to collect enrollment paperwork to enroll students from traditional public school football teams during the summer with intent for them to enroll in a charter school for less than 175 days.

OVERT ACT NO. (28): On or about and between January 1, 2017 and May 2019, SEAN MCMANUS, and JASON SCHROCK directed Earl Franklin to collect enrollment paperwork to enroll students from traditional public school football teams during the summer with intent for them to enroll in a charter school for less than 175 days.

OVERT ACT NO. (29): On or about and between January 1, 2017 and May 2019, SEAN MCMANUS, and JASON SCHROCK directed Mark Cupp Jr. to collect enrollment paperwork to enroll students from traditional public school athletic programs during the summer with intent for them to enroll in a charter school for less than 175 days.

OVERT ACT NO. (30): On or about and between January 1, 2017 and May 2019, SEAN MCMANUS, and JASON SCHROCK directed NYLA CRIDER to collect enrollment paperwork to enroll students from traditional public school football teams and other youth sports programs during the summer with intent for them to enroll in a charter school for less than 175 days.

ENROLLING STUDENTS IN PRE-EXISTING SPORTS PROGRAMS

CHARGES (cont'd)

OVERT ACT NO. (31): On or about July 12, 2017, SEAN MCMANUS approved via text, that NYLA CRIDER provide full funding to high school athletes that enrolled by August 1, 2017, as long as their registration documents were all backdated to July 1, 2017.

OVERT ACT NO. (32): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER to recruit as many high school teams as she could.

OVERT ACT NO. (33): In or around and between July, 2017 and November 2017, Luiz Rigney, at the direction of SEAN MCMANUS collected student master agreements, proof of age, and proof of residence for approximately 4,000 students participating in existing youth athletic programs.

OVERT ACT NO. (34): In or around and between July, 2017 and November 2017, SEAN MCMANUS offered Luiz Rigney \$25 per student he was able to enroll into summer school.

OVERT ACT NO. (35): In or around and between July, 2017 and November 2017, SEAN MCMANUS directed Luiz Rigney to provide youth sports programs \$25 per student that enrolled in the charter school.

OVERT ACT NO. (36): On or about and between July 1, 2017 and February 11, 2019 SEAN MCMANUS and JASON SCHROCK collected public funds through charter schools under their control from participants in existing summer youth sports programs brought in by Luiz Rigney without the charter school having any direct contact with the students over the summer.

OVERT ACT NO. (37): In or around and between July 1 2017, and June 30, 2018 SEAN MCMANUS and JASON SCHROCK, through charter schools under their control, enrolled students in charter schools earning around 40 days of attendance at approximately \$2000 per student.

OVERT ACT NO. (38): On or about July 2, 2017, JASON SCHROCK emailed Luiz Rigney "Summer School team, I know its crazy busy for you all, but I need updates please about each of your data collections to date, process, and projected student enrollments for Summer."

OVERT ACT NO. (39): On or about July 3, 2017, Luiz Rigney emailed JASON SCHROCK "All of mine are sending in their MA's and registration forms along with their activity logs in late August. I wanted to streamline it as much as possible having them send in paperwork once. This way they have more time to collect MA's which is the most difficult part."

OVERT ACT NO. (40): On or about July 3, 2017, JASON SCHROCK asked Luiz Rigney "Any guess on your numbers Lou? Need it for planning if possible."

OVERT ACT NO. (41): On or about July 3, 2017, Luiz Rigney responded to JASON SCHROCK "I'm guessing 7000 on the low end and 10000 on the high end."

CHARGES (cont'd)

OVERT ACT NO. (42): On or about July 7, 2017, SEAN MCMANUS emailed Luiz Rigney "Guys can I get an update in what we are doing in these regions please? Need to supercharge enrollment for the summer in these areas please advise thanks sean"

OVERT ACT NO. (43): On or about July 7, 2017, Luiz Rigney emailed SEAN MCMANUS and JASON SCHROCK "I have 10-15 football teams (each team averages 160 kids) from San Luis Obispo and Santa Barbara counties taking part. I have another 10 teams from Monterey county, 10 teams from Fresno county, and 15-20 from Merced and bordering counties.

OVERT ACT NO. (44): On or about July 8, 2017, SEAN MCMANUS texted Luiz Rigney "How are your numbers looking?"

OVERT ACT NO. (45): On or about July 8, 2017, Luiz Rigney responded to SEAN MCMANUS "They're great. I have about 11,000 kids that will be doing it. We'll see how many master agreements we get back but everyone is taking their time to get it done. Should have over 15,000 by the end of the week."

OVERT ACT NO. (46): On or about July 8, 2017, SEAN MCMANUS responded to Luiz Rigney "Keep rolling you never know where it will end up. Push."

OVERT ACT NO. (47): On or about July 8, 2017, Luiz Rigney texted SEAN MCMANUS "I've got this one football league that I am presenting too on Monday that has 16 teams but one of them is in San Joaquin County. The Board might say that they are not willing to work with us because we can't help the San Joaquin Team. Any thoughts? I just don't want to pass up the other 2000-2500 kids."

OVERT ACT NO. (48): On or about July 8, 2017, SEAN MCMANUS responded to Luiz Rigney "Sign them up" knowing that A3 controlled charter schools were not authorized in San Joaquin County or any county contiguous to San Joaquin County.

OVERT ACT NO. (49): On or about July 9, 2017, SEAN MCMANUS agreed to pay Luiz Rigney \$25 per students as well as \$25 per student for other recruiters Luiz Rigney brought on to find students to enroll.

OVERT ACT NO. (50): In or around August 2017, SEAN MCMANUS told Luiz Rigney if he enrolls 10,000 students he would buy him a trip to Tahiti.

OVERT ACT NO. (51): On or about September 16, 2017, Luiz Rigney texted SEAN MCMANUS "I've got a team here that didn't enter what grade their child is in, on any master agreements. Should I send them back and have them enter them in."

OVERT ACT NO. (52): On or about September 17, 2017, SEAN MCMANUS responded to Luiz Rigney "Estimate."

OVERT ACT NO. (53): On or about September 17, 2017, Luiz Rigney texted SEAN MCMANUS "I did."

CHARGES (cont'd)

OVERT ACT NO. (54): On or about September 17, 2017, SEAN MCMANUS texted Luiz Rigney "K then we are good."

OVERT ACT NO. (55): On or about November 14, 2017, JUSTIN SCHMITT emailed Luiz Rigney a spreadsheet indicating the total number of student master agreements he collected for Summer and the total number of enrollments verified.

OVERT ACT NO. (56): On or about November 14, 2017, the spreadsheet provided by JUSTIN SCHMITT to Luiz Rigney indicated Luiz Rigney collected 4,213 Master Agreements from various pre-existing youth programs primarily including high school football teams.

OVERT ACT NO. (57): On or about November 14, 2017, the spreadsheet provided by JUSTIN SCHMITT to Luiz Rigney indicated of the 4,213 master agreements he provided, 3,537 could be paid out at \$25 per student.

OVERT ACT NO. (58): On or about November 20, 2017, SEAN MCMANUS texted Luiz Rigney "So what's your total?"

OVERT ACT NO. (59): On or about November 20, 2017, Luiz Rigney responded to SEAN MCMANUS "About 5,200"

OVERT ACT NO. (60): On or about November 20, 2017, SEAN MCMANUS "That's a great first effort."

OVERT ACT NO. (61): In or around and between July 2017 and November 2017, the master agreements that Luiz Rigney collected from students were dated at the time of signature.

OVERT ACT NO. (62): On or about December 4, 2017, SEAN MCMANUS texted Luiz Rigney "Some of your kids have incorrect dates on master agreements I can't claim any attendance for these kids if we don't get a revised master agreement."

OVERT ACT NO. (63): On or about December 4, 2017, Luiz Rigney responded by text to SEAN MCMANUS "Organizations have this problem. I am being sent proper ma's."

OVERT ACT NO. (64): On or about December 4, 2017, SEAN MCMANUS responded by text to Luiz Rigney "Ok Good to hear."

OVERT ACT NO. (65): On or about December 5, 2017, Luiz Rigney texted SEAN MCMANUS "Can you confirm what the date needs to be on summer school mas? The first day of summer school, before it started, or any day within the range of dates that they participated."

OVERT ACT NO. (66): On or about December 5, 2017, SEAN MCMANUS texted Luiz Rigney and replied "7-1."

OVERT ACT NO. (67): On or about December 5, 2017, Luiz Rigney texted SEAN MCMANUS and asked "Their signature date needs to be 7-1?"

CHARGES (cont'd)

OVERT ACT NO. (68): On or about December 5, 2017, SEAN MCMANUS responded to Luiz Rigney "No it needs to be dated 7-1."

OVERT ACT NO. (69): On or about December 9, 2017, SEAN MCMANUS texted Luiz Rigney "I need to speak with urgently here is a huge problem with many of your master agreements. Please call me."

OVERT ACT NO. (70): On or about December 10, 2017, Luiz Rigney texted SEAN MCMANUS "Does it matter what date is written for the teacher signature? Justin [JUSTIN SCHMITT] was unsure."

OVERT ACT NO. (71): In or around December, 2017, SEAN MCMANUS directed Luiz Rigney to backdate around 4,000 master agreements he had collected to ensure the dates reflected student enrollment beginning on July 1, 2017 with knowledge that the agreements were signed by parents after July 1, 2017.

OVERT ACT NO. (72): In or around December, 2017, Luiz Rigney understood from SEAN MCMANUS that each student over summer generated around \$2000 and his boss, SEAN MCMANUS, would lose out on around \$8,000,000 if Luiz Rigney did not backdate the agreements.

OVERT ACT NO. (73): In or around December, 2017, Luiz Rigney understood that by backdating agreements he was misrepresenting the dates the students claimed to have participated in the charter school to generate additional public funds for SEAN MCMANUS.

OVERT ACT NO. (74): In or around December, 2017, Luiz Rigney backdated around 4,000 master agreements to July 1, 2017 at the direction of SEAN MCMANUS.

OVERT ACT NO. (75): In or around December, 2017, Luiz Rigney delivered the 4,000 backdated master agreements in suitcases to the A3 records collections office at 4684 Ontario Mills Pkwy, Ontario, CA 91764.

OVERT ACT NO. (76): In or around and between July 2017 and December 2017, youth football teams "enrolled" in A3 controlled charter schools by Luiz Rigney had no contact with charter school employees.

OVERT ACT NO. (77): In or around and between July 2017 and December 2017, youth football teams "enrolled" in A3 controlled charter schools by Luiz Rigney received no additional educational services than they would have otherwise received from their pre-existing programs.

OVERT ACT NO. (78): On or about June 1, 2018, Valiant Academy Los Angeles issued Luiz Rigney a check for \$93,725 as payment for bringing in students from youth football programs.

OVERT ACT NO. (79): On or about and between July 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK collected public funds through charter schools under their control from participants in existing summer youth sports programs brought in by Earl Franklin without the charter school having any direct contact the students.

CHARGES (cont'd)

OVERT ACT NO. (80): On or about and between June 2017 and December 2017, JASON SCHROCK informed Earl Franklin of the opportunity to earn money for recruiting students participating in existing sports programs to be enrolled in the charter schools.

OVERT ACT NO. (81): On or about and between July 1, 2017 and February 11, 2019, JASON SCHROCK offered Earl Franklin about \$50 per student that he recruited to the charter schools.

OVERT ACT NO. (82): On or about and between July 1, 2017 and February 11, 2019, Earl Franklin at the direction of JASON SCHROCK provided sports programs \$180 per student for student master agreements, proof of age, and proof of residence.

OVERT ACT NO. (83): On or about and between July 1, 2017 and February 11, 2019, Earl Franklin, directly, and through subordinates, collected thousands of master agreements to be enrolled in charter schools controlled by SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (84): In or around and between July 1 2017, and June 30, 2018, SEAN MCMANUS and JASON SCHROCK, through charter schools under their control, enrolled students using paperwork provided by Earl Franklin in charter schools earning around 40 days of attendance at approximately \$2000 per student.

OVERT ACT NO. (85): In or around January 2018, SEAN MCMANUS, JASON SCHROCK, NYLA CRIDER, Luiz Rigney, Mark Cupp Jr., and Earl Franklin, attended a breakout session at the annual A3 Education conference to discuss summer enrollment of existing athletic programs.

OVERT ACT NO. (86): In or around January 2018, Mark Cupp Jr. expressed concerns to JASON SCHROCK about "Non Teachers Leading" summer school programs.

OVERT ACT NO. (87): In or around January 2018, Mark Cupp Jr. expressed concerns to JASON SCHROCK about "Unknown Teachers" to the charter school signing student master agreements.

OVERT ACT NO. (88): In or around January 2018, Mark Cupp Jr. suggested to JASON SCHROCK that the summer program provide curriculum to participants in existing programs to use as work samples rather than PE logs of services not provided by the charter school.

ENROLLING STUDENTS FROM PRIVATE SCHOOLS AND PRIVATE LEARNING CENTERS

OVERT ACT NO. (89): On or about July 13, 2017, NYLA CRIDER texted SEAN MCMANUS and asked if they could keep the private school athletes enrolled in Valiant Charter Schools during the summer and traditional school year even though they were enrolled in private schools during the school year.

OVERT ACT NO. (90): On or about July 13, 2017, SEAN MCMANUS texted NYLA CRIDER "yes" in response to her question about keeping private school athletes in Valiant Charter Schools during the summer and school year.

CHARGES (cont'd)

OVERT ACT NO. (91): On or about August 4, 2017, NYLA CRIDER and SEAN MCMANUS discussed paying referral fees to parents who referred students to Valiant Charter Schools.

OVERT ACT NO. (92): On or about July 13, 2017, NYLA CRIDER texted SEAN MCMANUS that she needed to discuss 200 summer students she was bringing to Valiant Charter Schools from a private school who wanted to stay with Valiant Charter Schools during the fall and NYLA CRIDER wanted to know how to deal with the “\$\$\$\$.”

OVERT ACT NO. (93): On or about October 29, 2017, SEAN MCMANUS texted NYLA CRIDER he was thinking of doing summer school programs for the church next year.

OVERT ACT NO. (94): On or about October 29, 2017, NYLA CRIDER texted SEAN MCMANUS she had huge connections with tons of kids at church and was disappointed she hadn't thought about that for summer 2017.

FUNDAMENTAL FOUNDATIONS

OVERT ACT NO. (95): On or about and between July 1, 2017 and September 12, 2017, A3 Controlled Charter Schools enrolled students from Fundamental Foundations, a privately operated learning center with its own teaching staff.

OVERT ACT NO. (96): On or about September 12, 2017, SEAN MCMANUS texted NYLA CRIDER “Those fundamental foundation folks start 7-1 RIGHT.”

OVERT ACT NO. (97): On or about September 12, 2017, NYLA CRIDER responded “yes” to SEAN MCMANUS asking about the start date for Fundamental Foundations.

DISCOVERY OF LEARNING

OVERT ACT NO. (98): On or about and between July 2017, and February 2019, SEAN MCMANUS and JASON SCHROCK, through charter schools under their control, paid Discovery of Learning \$6000 per school year per student to provide students a full continuum of educational services.

OVERT ACT NO. (99): On or about and between July 2017 and February 2019, SEAN MCMANUS and JASON SCHROCK, enrolled Discovery of Learning students into charter schools under their control and collected between \$7,083 through \$9,269 per student per year in public funds depending on the age of the student.

OVERT ACT NO. (100): On or about and between July 2017 and February 2019, NYLA CRIDER assigned Ryan Valentine to be the teacher of record for Discovery of Learning for more than 25 students.

OVERT ACT NO. (101): On or about and between July 2017 and February 2019, NYLA CRIDER directed Ryan Valentine to collect paperwork from Discovery of Learning and not meet with students or families of students enrolled in Discovery of Learning.

WEST COAST COMMUNITY SERVICES

CHARGES (cont'd)

OVERT ACT NO. (102): On or about May 17, 2017, JASON SCHROCK and Sima Engelstein negotiated a contract between Valiant Charter School and West Coast Community Services, Inc.

OVERT ACT NO. (103): On or about May 17, 2017, Sima Engelstein on behalf of West Coast Community Services, agreed to provide the full continuum of educational services for students either directly or through a community partner selected by West Coast Community Services which included private schools.

OVERT ACT NO. (104): On or about May 17, 2017, JASON SCHROCK agreed on behalf of Valiant Charter Schools to pay West Coast Community Services \$5000 per year per student who enrolled in Valiant Charter School.

OVERT ACT NO. (105): On or about and between May 17, 2017 and February 11, 2019, Sima Engelstein collected \$500 per student per month from Valiant Los Angeles and CA STEAM SAN BERNARDINO and either provided the family directly with \$300 per student per month or provided a private school directly with \$300 per student per month.

OVERT ACT NO. (106): On or about and between July 2017 and February 2019, SEAN MCMANUS and JASON SCHROCK, through charter schools they control, enrolled students referred by Sima Engelstein of West Coast Community Services and collected between \$7,083 through \$9,269 per student per year in public funds depending on the age of the student.

OVERT ACT NO. (107): On or about June 27, 2017, JUSTIN SCHMITT emailed Sima Engelstein and referred to her as a Partner Program that must coordinate a time to deliver student files to the office.

OVERT ACT NO. (108): On or about and between July 2017 and February 2019, Sima Engelstein collected work samples for West Coast Community Services students and provided them to JASON SCHROCK and JUSTIN SCHMITT.

OVERT ACT NO. (109): On or about and between July 2017 and February 2019, A3 controlled charter school teachers had no direct contact with students brought in by Sima Engelstein and West Coast Community Services.
KOINONIA ACADEMIC CENTER

OVERT ACT NO. (110): On or about October 16, 2017, JASON SCHROCK emailed Noemi Carvajal to offer to pay for vendor services on behalf of A3 controlled charter schools, specifically "Vendors can make up to \$2,800/student/year or \$280/month/student for 10 months if all services are provided. This includes all of the instruction and curriculum from the vendor. Our charter school will provide the administration, accreditation, back office, and other educational services needed to make sure we are in line with the educational requirements."

OVERT ACT NO. (111): In or around October 2017 through May 2019, Noemi Carvajal provided student master agreements for between 50-70 students to JASON SCHROCK for the students to be enrolled in California Academy of Sports Science Fresno, California Vanguard Fresno, or University Prep Fresno.

OVERT ACT NO. (112): In or around October 2017 through May 2019, Noemi Carvajal provided students enrolled in California Academy of Sports Science Fresno, California Vanguard Fresno, or University Prep Fresno with the full continuum of educational services and support and received \$2800 per year per student from Uplift Monterey.

CHARGES (cont'd)

OVERT ACT NO. (113): On or about and between October 2017 and February 2019, SEAN MCMANUS and JASON SCHROCK, through charter schools they control, enrolled students from Koinonia Academic Center and collected between \$7,083 through \$9,269 per student per year in public funds depending on the age of the student.

OVERT ACT NO. (114): In or around October 2017 through May 2019, Koinonia Academic Center offered a five day per week classroom based instructional program for students in the Fresno Area.

OVERT ACT NO. (115): In or around October 2017 through May 2019, Koinonia Academic Center advertised its school as a faith based program.

ENROLLING TRADITIONAL SCHOOL DISTRICT STUDENTS DURING BREAKS

OVERT ACT NO. (116): In or around December, 2017 JASON SCHROCK and SEAN MCMANUS provided a Winter Camp to Raisin City Elementary School District students by paying Raising City School District employees to provide the program.

OVERT ACT NO. (117): In or around December, 2017 JASON SCHROCK and SEAN MCMANUS, through charter schools they control, enrolled students from the Raisin City Elementary School District for 17 Days of Charter ADA at a profit of over \$300,000.

OVERT ACT NO. (118): On or about December 21, 2017 JASON SCHROCK emailed SEAN MCMANUS and Viku Mehta of Williams Accountancy, explaining a proposed Winter Camp Partnership with Raisin City Elementary School District where students from Raisin City would be enrolled into the charter schools during winter break.

OVERT ACT NO. (119): On or about December 21, 2017 JASON SCHROCK explained to SEAN MCMANUS and Viku Mehta, "We have around 230 master agreements signed and collected, and the remaining 71 students are going to be collected and turned in over the next week. Total of 301 students for 3 weeks all from Raisin City District. We have all student info at the district."

OVERT ACT NO. (120): On or about December 21, 2017 JASON SCHROCK explained the cost and profit breakdown of the proposed winter camp to SEAN MCMANUS and Viku Mehta, "Total cost of camp: Christmas gifts: \$15/student x 301 [=] \$4500[,] Labor: 16 people at \$300 each [=] \$4800[,] Pizza party in January to collect work sample: [=] \$500[,] Total cost: [=] Less than \$10,000[,] Income from camp: [=] 17 days of ADA \$65 X 301 = \$332,605[,] Total Profit for School \$322,605."

OVERT ACT NO. (121): On or about December 21, 2017 SEAN MCMANUS emailed JASON SCHROCK, "Jason we can't cut this check, it needs to come from a school not [sic] us lets discuss[,] do not cut a check Viku thakns sean."

OVERT ACT NO. (122): On or about December 21, 2017 JASON SCHROCK emailed SEAN MCMANUS and Viku

Mehta, "Can we loan the school funds now to cut these checks? Less than \$7K I have to pay these people for the camp All have sent in their w-9's, but need to be able to cut them a check before end of December please."

CHARGES (cont'd)

OVERT ACT NO. (123): On or about December 21, 2017 SEAN MCMANUS directed JASON SCHROCK to call him to discuss payments for the winter camp and “we wont see any monet [sic] till march at the earliest” for California Academy Sports Science Fresno.

OVERT ACT NO. (124): On or about December 21, 2017 JASON SCHROCK directed Viku Mehta to prepare invoices in the name of California Academy Sports Science Fresno and not A3 and prepare a loan agreement from A3 to the school to be able to pay.”

ADMINISTRATIVELY SWITCHING SCHOOLS

OVERT ACT NO. (125): In or around and between July 1, 2015 and July 1, 2018, SEAN MCMANUS approved moving full-time online and homeschool students from one charter school to another charter school in a contiguous county without their knowledge in order to generate more than one ADA’s worth of public funding for the student.

OVERT ACT NO. (126): In or around and between July 2017 and May 2019, Ryan Valentine supervised students at the direction of NYLA CRIDER for the entire year including summer and students received additional funds over the summer.

OVERT ACT NO. (127): In or around and between July 2017 and September 2018, Ally Adair-Chung supervised charter school students within the A3 umbrella at the direction of NYLA CRIDER for the entire year including summer and such students received additional funds over the summer.

OVERT ACT NO. (128): On or about July 24, 2018, NYLA CRIDER asked Ally Adair-Chung to log into the Valiant Prep VOS system and switch students on her roster from one charter school to another charter school.

COMPLIANCE WITH FUNDING DETERMINATION SPENDING REQUIREMENTS

OVERT ACT NO. (129): On or about and between January 1, 2017 to February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Academics Arts and Action Charter Academy which conducted business as A3 Education.

OVERT ACT NO. (130): On or about and between January 1, 2017 and February 11, 2019, A3 Education invoiced charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles, for a total of \$25,931,423.52.

OVERT ACT NO. (131): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from A3 Education to CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

CHARGES (cont'd)

OVERT ACT NO. (132): On or about and between January 1, 2017 and February 11, 2019, A3 Education's business bank account that received the paid portions of the invoices did not show business expenses sufficient to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (133): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled A3 Consulting.

OVERT ACT NO. (134): On or about and between January 1, 2017 and February 11, 2019, A3 Consulting invoiced charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara,, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles for a total of \$44,022,947.48.

OVERT ACT NO. (135): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from A3 Consulting to CA STEAM San Bernardino, CA STEAM Santa Barbara, , California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

OVERT ACT NO. (136): On or about and between January 1, 2017 and February 11, 2019, A3 Consulting's business bank account that received the paid portions of the invoices did not show business expenses equivalent to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (137): On or about and between January 1, 2017 to February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Global Consulting Services.

OVERT ACT NO. (138): On or about and between January 1, 2017 to February 11, 2019, Global Consulting Services invoiced Charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles for a total of \$11,743,400.00.

OVERT ACT NO. (139): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from Global Consulting Services to CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

CHARGES (cont'd)

OVERT ACT NO. (140): On or about and between January 1, 2017 and February 11, 2019, Global Consulting Service's business bank account that received the paid portions of the invoices did not show business expenses equivalent to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (141): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Mad Dog Marketing.

OVERT ACT NO. (142): On or about and between January 1, 2017 and February 11, 2019, Mad Dog Marketing invoiced Charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift Santa Barbra, Uplift South, Uplift Monterey, Valiant Academy Southern California, Valiant Academy Los Angeles Valiant Santa Barbara for a total of \$1,605,000.00.

OVERT ACT NO. (143): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from Mad Dog Marketing to CA STEAM San Bernardino, CA STEAM Santa Barbara, , California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, Uplift Monterey, Valiant Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

OVERT ACT NO. (144): On or about and between January 1, 2017 and February 11, 2019, Mad Dog Marketing's business bank account that received the paid portions of the invoices did not show business expenses equivalent to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (145): On or about and between November 10, 2015 to February 11, 2019, SEAN MCMANUS and his wife owned Dalkieth Consulting, LLC.

OVERT ACT NO. (146): On or about May 24, 2017, Angela Slepak, on behalf of ROBERT WILLIAMS, requested auditor Chris Thibodeau reallocate payments of \$122,005.544 from Cal Prep Sutter K-7 to A3 Education to Certificated Salaries under Education Program Services.

OVERT ACT NO. (147): On or about May 24, 2017, Angela Slepak, on behalf of ROBERT WILLIAMS, requested auditor Chris Thibodeau reallocate payments of \$18,750 from Cal prep Sutter K-7 to Dalkieth Consulting to Certificated Salaries under Education Program Services.

OVERT ACT NO. (148): On or about May 24, 2017 Angela Slepak, on behalf of ROBERT WILLIAMS, requested auditor Chris Thibodeau reallocate payments of \$119,314.64 from Cal Prep Sutter 8-12 to A3 Education to Certificated Salaries under Education Program Services.

OVERT ACT NO. (149): On or about May 24, 2017, Angela Slepak, on behalf of ROBERT WILLIAMS, requested auditor Chris Thibodeau reallocate payments of \$18,750 from Cal prep Sutter 8-12 to Dalkieth Consulting to Certificated Salaries under Education Program Services.

CHARGES (cont'd)

OVERT ACT NO. (150): On or about May 25, 2017, Chris Thibodeau provided revised audits to ROBERT WILLIAMS with payments to A3 Education and Dalkieth Consulting reflected as teacher salaries.

OVERT ACT NO. (151): On or about May 24, 2017, Angela Slepak, on "behalf of ROBERT WILLIAMS", explained to Chris Thibodeau the need for the change, "these changes greatly affect the funding determination criteria percentages that are submitted to the California Department of Education. For purposes of receiving full funding, 40% of public revenue must be spent on instructional salaries (including 1099) employees), and benefits, and at least 80% of public revenue must be spent on all instructional expenses combined. With the changes mentioned above, California Prep Sutter K-7 and California Prep Sutter 8-12 charter schools will exceed the necessary percentages and receive full funding. Again, we are requesting that the Statement of Functional Expenses is revised to reflect these changes."

OVERT ACT NO. (152): On or about May 26, 2017, ROBERT WILLIAMS provided revised audits to SEAN MCMANUS stating "Pages that were changes is [sic] Audit report Date, page 13 note and functional expenses pages 21 and 22 Still waiting on Eli's [ELI JOHNSON] signature to submit and auditor will submit today or Tuesday."

OVERT ACT NO. (153): On or about May 24, 2017, SEAN MCMANUS and JASON SCHROCK did not pay for any Certificated Salaries from A3 Education or Dalkieth Consulting bank accounts for the charter schools, but instead the charter schools themselves paid for Certificated Salaries.

OVERT ACT NO. (154): On or about May 24, 2017 ROBERT WILLIAMS provided accountancy services to SEAN MCMANUS and JASON SCHROCK for A3 Education and Dalkieth Consulting.

OVERT ACT NO. (155): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK approved paying Michelle Holiday through Homeschool Marketing and Consulting for Valiant Charter Schools to be the featured charter school for Home School Campus.

OVERT ACT NO. (156): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS directed Michelle Holiday to write on all invoices from Homeschool Marketing and Consulting Services that services provided were Educational Services or Instructional Services.

OVERT ACT NO. (157): In or around September 2017, JASON SCHROCK requested Sima Engelstein write on all invoices for West Coast Community Services Inc. "Educational Services" even though she did not provide any direct instruction with students and passed on funds to private schools and families.

OVERT ACT NO. (158): On or about and between January 1, 2017 and February 11, 2019, Enriqueta Luquin monitored spending levels coded as instructional services and certificated salaries of A3 controlled charter schools using QuickBooks.

OVERT ACT NO. (159): On or about and between January 1, 2017 and February 11, 2019, Enriqueta Luquin provided frequent reports to SEAN MCMANUS about expenses coded as instructional services and certificated salaries.

CHARGES (cont'd)

OVERT ACT NO. (160): On or about and between January 1, 2017 and February 11, 2019 SEAN MCMANUS provided additional invoices for payment for A3 Education, A3 Consulting, Global Consulting Services, and/or Mad Dog Marketing labeled as Instructional Services, Educational Services, or Certificated Salaries to allow the charter school to meet 80% spending on instructional services, and/or 40% spending on certificated salaries, prior to budget reports being forwarded to charter authorizers and state agencies.

OVERT ACT NO. (161): On or about and between January 1, 2017 and February 11, 2019 SEAN MCMANUS told Enriqueta Luquin that he could bill for additional Educational Services because he never billed for all of the services he previously provided.

REPRESENTATIONS TO THE AUDITOR

OVERT ACT NO. (162): On or about June 30, 2016, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing JASON SCHROCK as a board member.

OVERT ACT NO. (163): On or about June 30, 2016, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing SEAN MCMANUS as CEO of the nonprofit corporation.

OVERT ACT NO. (164): In or around December, 2017, Chris Thibodeau of Squar Milner, when conducting an annual independent audit of Cal Prep Sutter Charter Schools for the fiscal year ending June 30, 2017, expressed a concern by email to the client about the Cal Prep Sutter Charter Schools relationship with A3 Education, Global Consulting Services and potential fraud.

OVERT ACT NO. (165): On or around December 12, 2017, around 10:55 p.m., in response to concerns from auditor Chris Thibodeau, JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of Cal Prep Sutter Board Minutes from June 25, 2015 that did not state vendor contract for services were discussed at the meeting.

OVERT ACT NO. (166): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter K-7 and A3 Education.

OVERT ACT NO. (167): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter 8-12 and A3 Education.

OVERT ACT NO. (168): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter 8-12 and Global Consulting Services.

OVERT ACT NO. (169): On or about December 13, 2017, around 9:19 a.m., ROBERT WILLIAMS emailed Viku Meta and directed him to print out the documents provided by JASON SCHROCK on December 12, 2017.

CHARGES (cont'd)

OVERT ACT NO. (170): On or about December 13, 2017, around 9:39 a.m., ROBERT WILLIAMS forwarded concerns expressed by Viku Meta to JASON SCHROCK that the Global Consulting services agreement pages were not legible.

OVERT ACT NO. (171): On or about December 13, 2017, around 9:40 a.m., ROBERT WILLIAMS emailed JASON SCHROCK "The minutes or agenda does not refer to approving A3 contract."

OVERT ACT NO. (172): On or about December 13, 2017, around 9:42 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "I'm on the road...can you have Viku make some changes that you need fixed?"

OVERT ACT NO. (173): On or about December 13, 2017, around 9:45 a.m., ROBERT WILLIAMS emailed JASON SCHROCK "No has to come from you without Viku his knowledge These are Board minutes."

OVERT ACT NO. (174): On or about December 13, 2017, around 10:02 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "I'll call you in a little bit what do you need change?"

OVERT ACT NO. (175): On or about December 13, 2017, around 10:03 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "Ok I will go back and fix them."

OVERT ACT NO. (176): On or about December 13, 2017 around 10:05 a.m., ROBERT WILLIAMS emailed JASON SCHROCK concerned that Schrock should not fabricate Board minutes for any meeting that Chris Thibodeau has access to the pre-existing minutes for, stating specifically "Problem is will they contradict anything they already have access to. Can't have two sets of minutes for a meeting."

OVERT ACT NO. (177): On or about December 13, 2017, around 10:30 a.m., JASON SCHROCK emailed ROBERT WILLIAMS new minutes for June 25, 2015 board minutes, now demonstrating that Vendor Contract for Services was approved by the Cal Prep Sutter Board via motion by Trustee Rita "Reece" whose actual name is Rita Reese.

OVERT ACT NO. (178): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of the June 25, 2015 Board minutes JASON SCHROCK revised.

OVERT ACT NO. (179): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of A3 Management Agreements with Cal Prep Sutter K-7 dated June 30, 2015 and electronically signed by "Rita Reece."

OVERT ACT NO. (180): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of A3 Management Agreements with Cal Prep Sutter 8-12 dated June 30, 2015 and electronically signed by "Rita Reece."

OVERT ACT NO. (181): On or about and between June 2015 through May 2019, Rita Reese did not sign any management agreements between Cal Prep Sutter K-7 and A3 Education in her name or as misspelled in the agreement as "Rita Reece."

CHARGES (cont'd)

OVERT ACT NO. (182): On or about and between June 2015 through May 2019, Rita Reese did not sign any management agreements between Cal Prep Sutter 8-12 and A3 Education in her name or as misspelled in the agreement as "Rita Reece."

OVERT ACT NO. (183): On or about December 14, 2017, around 10:11 p.m. SEAN MCMANUS emailed JASON SCHROCK a letter of resignation from Cal Prep Sutter stating that he resigned from CAL PREP Sutter effective June 30, 2016.

OVERT ACT NO. (184): On or about December 14, 2017, around 10:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS with July 6, 2016 board meeting minutes demonstrating SEAN MCMANUS resigned from the charter school and ELI JOHNSON was promoted to the CEO.

OVERT ACT NO. (185): On or about December 15, 2017, around 2:34 p.m., JASON SCHROCK emailed Robert Sikma (Board President) ROBERT WILLIAMS, and SEAN MCMANUS "Please sign and send to the auditor. Eli... please make sure you read and are aware of this letter for us all to be on the same page and response should the auditor calls us again. Thank you sir!"

OVERT ACT NO. (186): On or about December 15, 2017, around 2:46 p.m., ROBERT WILLIAMS emailed JASON SCHROCK, "Did you make any changes? Did Eli [ELI JOHNSON] read so he knows his responsibility when speaking to the auditor? Is it better to be in email form since the questions were email form. We don't want to elevate the correspondence to formal letters."

OVERT ACT NO. (187): On or about December 15, 2017, around 2:49 p.m., JASON SCHROCK emailed ROBERT WILLIAMS, Robert Sikma, SEAN MCMANUS, and ELI JOHNSON "I like the letter response."

OVERT ACT NO. (188): On or about December 15, 2017, around 3:03 p.m., ROBERT WILLIAMS emailed JASON SCHROCK, "Spoke to Rob You will respond to Chris's emails per an email and cc Eli [ELI JOHNSON] on it. It will be done in 20 minutes."

OVERT ACT NO. (189): On or about December 15, 2017, around 3:56 p.m., ELI JOHNSON emailed ROBERT WILLIAMS, JASON SCHROCK, and Robert Sikma, "I have read and I am up to speed on the response from the board."

OVERT ACT NO. (190): On or about December 15, 2017, around 3:57 p.m., ELI JOHNSON emailed ROBERT WILLIAMS, JASON SCHROCK, and Robert Sikma "If Chris calls me I will let you know before calling him back."

OVERT ACT NO. (191): On or about December 15, 2017, around 3:57 p.m., SEAN MCMANUS emailed JASON SCHROCK, ELI JOHNSON, ROBERT WILLIAMS, and Robert Sikma, "Eli I think it would be best if you not speak to the auditor at this point, if he reaches out please contact Jason [JASON SCHROCK]."

OVERT ACT NO. (192): On or about December 15, 2017, around 4:02 p.m., ELI JOHNSON emailed SEAN MCMANUS and ROBERT WILLIAMS, JASON SCHROCK, and Robert Sikma, "Will do" taking direction from SEAN MCMANUS and demonstrating SEAN MCMANUS was still in control of Cal Prep Sutter.

CHARGES (cont'd)

OVERT ACT NO. (193): On or about December 15, 2017, Robert Sikma emailed auditor Chris Thibodeau at the direction of SEAN MCMANUS, JASON SCHROCK, and ROBERT WILLIAMS that contained false statements meant to shield payments made to A3 Education and Global Consulting Services and the relationship between SEAN MCMANUS and Cal Prep Sutter Charter Schools.

OVERT ACT NO. (194): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "Mr. Eli Johnson is the CEO of California Prep Sutter" when, in fact, ELI JOHNSON actually reported to SEAN MCMANUS.

OVERT ACT NO. (195): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "Within Eli's role as CEO, he is responsible for the review of the financial statements and audit information."

OVERT ACT NO. (196): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "All payments made to A3 and Global Consulting have been appropriately approved per the process mentioned above. The Memorandum of Understanding between A3 and the school and Global Consulting and the school have been reviewed and approved by the Board of Directors, see enclosed board minutes"

OVERT ACT NO. (197): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "The American Express card is in the name of Sean McManus. However, Richard Nguyen, the business manager is in possession of this card and authorizes the purchases."

OVERT ACT NO. (198): On or about December 15, 2017 Robert Sikma forwarded his letter to auditor Chris Thibodeau to JASON SCHROCK, ROBERT WILLIAMS, and ELI JOHNSON and indicated he did so to ensure "we are all on the same page."

OVERT ACT NO. (199): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools dated June 30, 2017.

OVERT ACT NO. (200): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing JASON SCHROCK as a board member.

OVERT ACT NO. (201): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing SEAN MCMANUS as CEO.

OVERT ACT NO. (202): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing ELI JOHNSON as the administrator of the school.

OVERT ACT NO. (203): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools identifying that the charter school engaged in related party transactions with SEAN MCMANUS.

CHARGES (cont'd)

OVERT ACT NO. (204): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter lacked internal controls because the school used check disbursements from "a signature of an individual that is not involved in management or the Board of Directors."

OVERT ACT NO. (205): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter did not provide evidence that journal entries and invoices were reviewed and authorized, as evidenced by initial or signature.

OVERT ACT NO. (206): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter did "not provide documentation to support several invoices and journal entries."

OVERT ACT NO. (207): On or about February 15, 2017, CA PREP Sutter Charter Schools (C3625043) business filings no longer showed SEAN MCMANUS as the registered agent.

OVERT ACT NO. (208): In or around December 2018, CA PREP Sutter Charter Schools hired Jeffrey Hill to conduct its annual audit instead of SquarMilner which reported finding related party transactions, and findings related to improper invoicing and payments during the prior year's audit.

SEEKING AUTHORIZATION FROM SMALL SCHOOL DISTRICTS

OVERT ACT NO. (209): In or around July, 2015, SEAN MCMANUS and Rita Reese sought and obtained authorization for California Prep Sutter K-7 from the Meridian Elementary School District.

OVERT ACT NO. (210): In or around July, 2015, SEAN MCMANUS and Rita Reese sought and obtained authorization for California Prep Sutter 8-12 from the Meridian Elementary School District.

OVERT ACT NO. (211): In or around July 2015, Meridian Elementary School District was a school district with around 75 annual ADA.

OVERT ACT NO. (212): In or around March, 2016, ELI JOHNSON submitted a charter petition to Liberty School District and was granted authorization for CA STEAM Sonoma .

OVERT ACT NO. (213): In or around March 2016, Liberty Elementary School District was a school district with around 200 annual ADA.

OVERT ACT NO. (214): In or around April 2017, ELI JOHNSON submitted a charter petition to and was granted authorization for CA STEAM Sonoma II by the Guerneville Elementary School District.

OVERT ACT NO. (215): In or around April 2017, Guerneville Elementary School District was a school district with around 270 annual ADA.

CHARGES (cont'd)

OVERT ACT NO. (216): On or about and between January 2016 and August 2016, SEAN MCMANUS and ELI JOHNSON attended a board meeting of the Trona Joint Unified School District and proposed the district authorize CA STEAM San Bernardino because as a small school district Trona could make profit from oversight fees and could earn free summer school.

OVERT ACT NO. (217): In or around July 2016, ELI JOHNSON submitted a charter petition to and was granted authorization for CA STEAM San Bernardino by the Trona Joint Unified School District.

OVERT ACT NO. (218): On or about April 16, 2018, ELI JOHNSON and JUSTIN SCHMITT submitted a charter petition to the Trona Joint Unified School District and were granted authorization for University PREP San Bernardino.

OVERT ACT NO. (219): In or around July 2016, Trona Joint Unified School District was a school district with around 250 annual ADA.

OVERT ACT NO. (220): In or around July 2016, ELI JOHNSON submitted a charter petition for CA STEAM Santa Barbara to the Cuyama Joint Unified School District and was granted authorization.

OVERT ACT NO. (221): In or around July, 2017, ELI JOHNSON submitted a charter petition to and was granted authorization for Valiant Santa Barbara by the Cuyama Joint Unified School District.

OVERT ACT NO. (222): In or around July, 2017, ELI JOHNSON submitted a charter petition to the Cuyama Joint Unified School District and was granted authorization for Uplift Santa Barbara.

OVERT ACT NO. (223): In or around and between July 2016 and July 2017, Cuyama Joint Unified School District was a school district with around 200 annual ADA.

OVERT ACT NO. (224): On or about August 10, 2017, JUSTIN SCHMITT submitted a charter petition to and was granted authorization for California Academy of Sports Science by the Dehesa Elementary School District.

OVERT ACT NO. (225): On or around May 8, 2018, JUSTIN SCHMITT submitted a charter petition and obtained authorization for University Prep from the Dehesa Elementary School District.

OVERT ACT NO. (226): In or around and between August 2017 and May 2018, Dehesa Elementary School District was a school district with around 135 annual ADA.

OVERT ACT NO. (227): On or about August 23, 2016, at the direction of SEAN MCMANUS, Luiz Rigney submitted a charter petition to and was granted authorization for UPLIFT California Monterey Charter School by Bradley Union School District.

OVERT ACT NO. (228): In or around July, 2017, at the direction of SEAN MCMANUS, Luiz Rigney submitted a charter petition to and was granted authorization for Uplift California North by the Bradley Elementary School District.

CHARGES (cont'd)

OVERT ACT NO. (229): In or around July, 2017, at the direction of SEAN MCMANUS, Luiz Rigney submitted a charter petition to and was granted authorization for Uplift California South by the Bradley Elementary School District.

OVERT ACT NO. (230): In or around August 2016, Bradley Union School District was a school district with around 75 annual ADA.

OVERT ACT NO. (231): On or around and between July 2017 and January 2018, at the direction of JASON SCHROCK, Fernando Napoles petitioned for and obtained authorization for the California Academy of Sports Science Fresno from the Raisin City Elementary School District.

OVERT ACT NO. (232): On or about March 29, 2018, at the direction of JASON SCHROCK, Fernando Napoles submitted a charter petition to and was granted authorization for University PREP Fresno Charter School by the Raisin City Elementary School District.

OVERT ACT NO. (233): On or about May 1, 2018, at the direction of JASON SCHROCK, Fernando Napoles submitted a charter petition to and was granted authorization for California Vanguard Academy-Fresno Charter School by the Raisin City Elementary School District.

OVERT ACT NO. (234): In or around and between July 2017 and May 2018 Raisin City Elementary School District was a school district with around 280 annual ADA.

IDENTIFYING SUBORDINATE PARTIES AS CHARTER SCHOOL LEADERS ON PUBLIC DOCUMENTS

OVERT ACT NO. (235): On or about and between July 2015 to May 2019, ELI JOHNSON served as a subordinate to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (236): On or about and between July 2015 to May 2019, JUSTIN SCHMITT served as a subordinate to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (237): On or about and between July 2016 to May 2019, Luiz Rigney served as a subordinate to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (238): On or about and between July 2017 to May 2019, Fernando Napoles served as a subordinate to JASON SCHROCK.

CAL PREP SUTTER CHARTER SCHOOLS (K-7 & 8-12)

OVERT ACT NO. (239): On or about and Between July 2015 and May 2019, ELI JOHNSON served as the contact person for Cal Prep Sutter K-7 and Meridian Elementary School District, despite being a subordinate to SEAN MCMANUS and JASON SCHROCK.

CHARGES (cont'd)

OVERT ACT NO. (240): On or about and Between July 2015 and April 2015, ELI JOHNSON served as the contact person for Cal Prep Sutter 8-12 and Meridian Elementary School District, despite being a subordinate to SEAN MCMANUS.

OVERT ACT NO. (241): On or about November 23, 2015 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal PREP Sutter K-7 certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (242): On or about December 14, 2017, SEAN MCMANUS and JASON SCHROCK fabricated a letter of resignation and corresponding board minutes for SEAN MCMANUS in order to appease Chris Thibodeau of Squar Milner who questioned whether ELI JOHNSON was the CEO of Cal Prep Sutter Charter Schools.

OVERT ACT NO. (243): On or about February 9, 2017 SEAN MCMANUS directed ROBERT WILLIAMS and Angela Slepak to submit Statements of Information for Cal Prep Sutter Charter Schools and list ELI JOHNSON as the CEO.

OVERT ACT NO. (244): On or about February 15, 2015, ROBERT WILLIAMS submitted a statement of information for California Prep Sutter Charter Schools (C3625043) and listed ELI JOHNSON as the CEO.

OVERT ACT NO. (245): In or around June 2017, the funding determination form for California Prep Sutter K-7 submitted to the Advisory Commission on Charter Schools listed ELI JOHNSON as the COO of California Prep Sutter K-7.

OVERT ACT NO. (246): In or around June 2017, the funding determination form for California Prep Sutter 8-12 submitted to the Advisory Commission on Charter Schools listed ELI JOHNSON as the COO of California Prep Sutter 8-12.

OVERT ACT NO. (247): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools dated June 30, 2017 based on documentation provided by SEAN MCMANUS, JASON SCHROCK, and/or their subordinates.

OVERT ACT NO. (248): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing SEAN MCMANUS as CEO.

OVERT ACT NO. (249): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing ELI JOHNSON as the administrator of the school.

OVERT ACT NO. (250): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

CHARGES (cont'd)

OVERT ACT NO. (251): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018 listed ELI JOHNSON as administrator of the school instead of SEAN MCMANUS.

OVERT ACT NO. (252): In or around and between the November 2015 and April 30, 2019, ELI JOHNSON told Anne Sykes of Meridian Elementary School District that Cal Prep Sutter was the only charter school he worked with.

OVERT ACT NO. (253): On or about and between July 1, 2015 and February 20, 2019, the CDE information page for Cal prep Sutter K-7 listed ELI Johnson as the Chief Academic Officer and Chief Business Official of Cal Prep Sutter K-7.

OVERT ACT NO. (254): On or about February 20, 2019, the CDE information page for Cal Prep Sutter 8-12 listed ELI Johnson as the Chief Academic Officer and Chief Business Official of Cal Prep Sutter 8-12.

CA STEAM SONOMA/II

OVERT ACT NO. (255): On or about and between July 2016 and February 2017, ELI JOHNSON served as the contact person for CA STEAM Sonoma, despite being a subordinate to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (256): On or about and between July 2017 and May 2019, ELI JOHNSON served as the contact person for CA STEAM Sonoma II, despite being a subordinate to SEAN MCMANUS.

OVERT ACT NO. (257): On or about March 11, 2016, SEAN MCMANUS filed Articles of Incorporation for CA STEAM Sonoma (3884753).

OVERT ACT NO. (258): On or about March 11, 2016 CA STEAM Sonoma (3884753) Bylaws designated A3 Education as its Sole Statutory Member.

OVERT ACT NO. (259): On or about February 15, 2017, ROBERT WILLIAMS filed an updated business filing for CA STEAM Sonoma (3884753) removing SEAN MCMANUS and listing ELI JOHNSON as CEO for CA STEAM Sonoma.

OVERT ACT NO. (260): On or about April 10, 2017, charter petition for CA STEAM Sonoma II listed ELI JOHNSON as lead petitioner and contact for the school to Guerneville Elementary School District.

OVERT ACT NO. (261): On or around October 23, 2017, Liberty Elementary School District issued a Notice of Violation for CA STEAM Sonoma addressed to ELI JOHNSON believing him to be the Executive Director.

OVERT ACT NO. (262): On or around October 23, 2017, Liberty Elementary School District issued a Notice of Violation for CA STEAM Sonoma indicating ELI JOHNSON was nonresponsive to requests for information.

CHARGES (cont'd)

OVERT ACT NO. (263): On or around October 23, 2017, Liberty Elementary School District issued a Notice of Violation for CA STEAM Sonoma indicating CA STEAM SONOMA submitted "extremely inaccurate" first interim report and ELI JOHNSON could not justify egregious errors.

OVERT ACT NO. (264): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (265): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, and listed ELI JOHNSON as the Administrator of the school.

OVERT ACT NO. (266): On or about January 19, 2018, CA STEAM SONOMA voluntarily closed in lieu of having their charter revoked by Liberty School District due to fiscal mismanagement and charter violations.

OVERT ACT NO. (267): In or around February, 2018, funding determination form for CA STEAM Sonoma II submitted to the Advisory Commission on Charter Schools, listed ELI Johnson as the Administrator of CA STEAM Sonoma II.

OVERT ACT NO. (268): In or around April, 2018, funding determination form for CA STEAM Sonoma submitted to the Advisory Commission on Charter Schools, listed ELI JOHNSON as the COO of CA STEAM Sonoma.

OVERT ACT NO. (269): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (270): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018 and listed ELI JOHNSON as the Executive Director.

OVERT ACT NO. (271): On or about and between July 1, 2016 and February 21, 2019, the CDE information page for CA STEAM Sonoma listed ELI Johnson as the Administrator for CA STEAM Sonoma.

OVERT ACT NO. (272): On or about February 21, 2019, the CDE information page for CA STEAM Sonoma II listed ELI Johnson as the Administrator for CA STEAM Sonoma.

CA STEAM SAN BERNARDINO

OVERT ACT NO. (273): On or about and between July 2016 and May 2019, ELI JOHNSON served as the contact between CA STEAM San Bernardino and Trona Joint Unified School District, despite being a subordinate to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (274): On or about July 1, 2016, the charter petition for CA STEAM San Bernardino listed ELI JOHNSON as lead petitioner and contact for the school to Trona Joint Unified School District.

CHARGES (cont'd)

OVERT ACT NO. (275): On or about and between July 1, 2016 to February 11, 2019, ELI JOHNSON served as the contact person to Trona Joint Unified School District for CA STEAM San Bernardino.

OVERT ACT NO. (276): On or about September 15, 2016 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal STEAM San Bernardino certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (277): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (278): On or about December 8, 2017, Jeffrey Hill submitted an audit for CA STEAM San Bernardino dated June 30, 2017 and listed ELI JOHNSON as the Administrator of the school.

OVERT ACT NO. (279): In or around April 18, 2018, the funding determination form submitted to the Advisory Commission on Charter Schools listed ELI JOHNSON as the Administrator of the school.

OVERT ACT NO. (280): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (281): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (282): On or about February 20, 2019, the CDE information page for CA STEAM San Bernardino listed ELI Johnson as the Administrator for CA STEAM San Bernardino.

CA STEAM SANTA BARBARA

OVERT ACT NO. (283): On or about and between July 2017 and May 2019, ELI JOHNSON served as the contact between CA STEAM Santa Barbara and Cuyama Joint Unified School District, despite being a subordinate to SEAN MCMANUS and JASON SCHROCK..

OVERT ACT NO. (284): On or about July 1, 2016, the charter petition for CA STEAM Santa Barbara listed ELI JOHNSON as contact for the school to Cuyama Joint Unified School District.

OVERT ACT NO. (285): On or about September 15, 2016 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal STEAM Santa Barbara certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (286): On or about June 13, 2017, CA STEAM Santa Barbara (C3953915) replaced JASON SCHROCK as registered agent with ELI JOHNSON on the business filing.

CHARGES (cont'd)

OVERT ACT NO. (287): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (288): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, and listed ELI JOHNSON as the Superintendent of the school.

OVERT ACT NO. (289): In or around April 18, 2018, the funding determination form submitted to the Advisory Commission on Charter Schools listed ELI JOHNSON as the Administrator of CA STEAM Santa Barbara.

OVERT ACT NO. (290): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (291): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018, and listed ELI JOHNSON as the administrator of the school.

OVERT ACT NO. (292): On or about February 20, 2019, the CDE information page for CA STEAM Santa Barbara listed ELI JOHNSON as the Administrator for CA STEAM Santa Barbara.

VALIANT ACADEMY SOUTHERN CALIFORNIA

OVERT ACT NO. (293): On or about and between November 2016 and May 2019, JUSTIN SCHMITT served as the contact between Valiant Academy Southern California and Dehesa Elementary School District, despite being a subordinate to SEAN MCMANUS.

OVERT ACT NO. (294): On or about September 8, 2017, JASON SCHROCK filed an updated statement of information for Valiant Academy San Diego (C3966287), identifying himself as the Chief Financial Officer.

OVERT ACT NO. (295): On or about August 17, 2018, ROBERT WILLIAMS filed an updated statement of information for Valiant Academy of Southern California (C3966287) removing JASON SCHROCK as the CFO.

OVERT ACT NO. (296): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (297): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017 which listed JASON SCHROCK as the President of the school.

OVERT ACT NO. (298): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017 which listed JUSTIN SCHMITT as the Director of the school.

CHARGES (cont'd)

OVERT ACT NO. (299): On or about November 2, 2018, JASON SCHROCK emailed Francis Price and Christina Bays requesting his signature be removed from checks for Valiant SD and to replace them with Robert Sikma.

OVERT ACT NO. (300): In or around December 2017, the funding determination form submitted to the Advisory Commission on Charter Schools for Valiant Academy of Southern California identified Justin Schmitt as the administrator.

OVERT ACT NO. (301): On or about February 22, 2019, the CDE information page for Valiant Academy of Southern California listed JUSTIN SCHMITT as the Administrator for Valiant Academy Southern California.

VALIANT ACADEMY OF LOS ANGELES

OVERT ACT NO. (302): On or about and between November 2016 and May 2019, JUSTIN SCHMITT served as the contact between Valiant Academy Los Angeles and Acton Agua Dulce Unified District, despite being a subordinate to SEAN MCMANUS.

OVERT ACT NO. (303): On or about September 8, 2017, JASON SCHROCK filed an updated statement of information for Valiant Academy LA (C3966286), identifying himself as the Chief Financial Officer.

OVERT ACT NO. (304): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 based on information provided to him by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (305): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 and listed JASON SCHROCK as the President of the school.

OVERT ACT NO. (306): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 and listed JUSTIN SCHMITT as the Director of the school.

OVERT ACT NO. (307): On or about August 17, 2018, ROBERT WILLIAMS filed an updated statement of information for Valiant Academy LA (C3966286) removing JASON SCHROCK as the CFO.

OVERT ACT NO. (308): On or about November 2, 2018, JASON SCHROCK emailed Francis Price and Christina Bays requesting that his signature be removed from checks for Valiant LA and to replace them with Robert Sikma.

OVERT ACT NO. (309): On or about February 22, 2019, the CDE information page for Valiant Academy of Los Angeles listed JUSTIN SCHMITT as the Director of Schools for Valiant Academy of Los Angeles.

VALIANT SANTA BARBARA

OVERT ACT NO. (310): On or about and between July 2017 and May 2019, ELI JOHNSON served as the contact between Valiant Academy Southern California and Cuyama Joint Unified School District, despite being a subordinate to SEAN MCMANUS.

CHARGES (cont'd)

OVERT ACT NO. (311): On or about July 1, 2017, the charter petition for Valiant Santa Barbara listed ELI JOHNSON as lead petitioner and contact for the school with Cuyama Joint Unified School District.

OVERT ACT NO. (312): In or around February 2018, the funding determination form submitted to the Advisory Commission on charter schools identified ELI JOHNSON as the Administrator of Valiant Santa Barbara.

OVERT ACT NO. (313): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (314): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018, the annual audit for Valiant Santa Barbara listed ELI JOHNSON as the administrator.

OVERT ACT NO. (315): On or about February 22, 2019, the CDE information page for Valiant Santa Barbara listed ELI JOHNSON as the Director of Schools for Valiant Academy Santa Barbara.

UPLIFT CALIFORNIA (MONTEREY)

OVERT ACT NO. (316): On or about and between July 2017 and May 2019, Luiz Rigney served as the contact between Uplift Monterey and Bradley Union School District, despite being a subordinate to SEAN MCMANUS.

OVERT ACT NO. (317): On or about July 2016-July 2017, SEAN MCMANUS directed Luiz Rigney to not disclose the existence of A3 Education (and his role) to Bradley Union School District because it complicates things.

OVERT ACT NO. (318): On or about July 1, 2016, the charter petition for Uplift Monterey listed Luiz Rigney as the lead petitioner and contact for the school with Bradley Union School District.

OVERT ACT NO. (319): On or about July 25, 2016, SEAN MCMANUS directed Luiz Rigney to fill out paperwork to register UPLIFT California Charter Schools (C3930004) as a non-profit corporation in the State of California and claim he is the chief officer of Uplift California Charter Schools.

OVERT ACT NO. (320): On or about and between August 2016 and May 2017, Luiz Rigney asked SEAN MCMANUS to remove his name from the corporate paperwork for UPLIFT California Charter Schools (C3930004) because he was not the CEO of Uplift Charter Schools.

OVERT ACT NO. (321): On or about March 8, 2017, ROBERT WILLIAMS filed an updated statement of information for Uplift California Charter Schools (C3930004), identifying ELI JOHNSON as the CEO, Secretary, and Chief Financial Officer for Uplift California Charter Schools.

OVERT ACT NO. (322): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

CHARGES (cont'd)

OVERT ACT NO. (323): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterrey dated June 30, 2017 and listed ELI JOHNSON as the Superintendent of the school.

OVERT ACT NO. (324): In or around April 2018, the funding determination form submitted to the Advisory Commission on Charter Schools for Uplift Monterrey indicated that ELI JOHNSON was the Administrator and Charter School Director of Uplift Monterrey.

OVERT ACT NO. (325): On or about February 22, 2019, the CDE information page for Uplift Monterrey listed RICHARD NGUYEN as the Chief Business Official and Business Manager for Uplift Monterrey.

UPLIFT SANTA BARBARA

OVERT ACT NO. (326): On or about October 27, 2017, Articles of Incorporation were filed bearing the name and signature of Lambert Sikkema, but without Lambert Sikkema's knowledge or approval.

OVERT ACT NO. (327): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (328): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018 and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (329): On or about February 22, 2019, the CDE information page for Uplift Santa Barbara listed ELI JOHNSON's email as the email for contacting Uplift Santa Barbara.

OVERT ACT NO. (330): In or around February 2018, the funding determination form submitted to the Advisory Commission on Charter Schools for Uplift Santa Barbara indicated that ELI JOHNSON was the Administrator and Charter School Director of Uplift Monterrey.

UPLIFT CALIFORNIA NORTH

OVERT ACT NO. (331): On or about July 1, 2017, the charter petition for Uplift CA North listed Luiz Rigney as lead petitioner and contact for the school to Bradley Elementary School District.

OVERT ACT NO. (332): On or about February 22, 2019, the CDE information page for Uplift Santa Barbara listed Luiz Rigney's email as the contact email for Uplift California North.

UPLIFT CALIFORNIA SOUTH

OVERT ACT NO. (333): On or about July 1, 2017, the charter petition for Uplift CA South listed Luiz Rigney as lead petitioner and contact for the school to Bradley Elementary School District.

CHARGES (cont'd)

OVERT ACT NO. (334): On or about February 22, 2019, the CDE information page for Uplift Santa Barbara listed Luiz Rigney's email as the contact email for Uplift California North.

CALIFORNIA ACADEMY OF SPORTS SCIENCE

OVERT ACT NO. (335): In or around February 2016, the funding determination form submitted to the Advisory Commission on Charter Schools listed JUSTIN SCHMITT as the Administrator for California Academy of Sports Science.

OVERT ACT NO. (336): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (337): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018, that Listed ELI JOHNSON as the Administrator for California Academy of Sports Science.

OVERT ACT NO. (338): On or about February 21, 2019, the CDE information page for California Academy of Sports Science listed JUSTIN SCHMITT as the Administrator for California Academy of Sports Science.

CALIFORNIA ACADEMY OF SPORTS SCIENCE FRESNO

OVERT ACT NO. (339): On or about February 21, 2019, the CDE information page for California Academy of Sports Science Fresno listed Viku Mehta, employee of ROBERT WILLIAMS as the Chief Business Official.
UNIVERSITY PREP

OVERT ACT NO. (340): On or about May 8, 2018, the charter petition for University PREP designated JUSTIN SCHMITT as the lead petitioner and contact for the charter school to Trona Joint Unified School District.

OVERT ACT NO. (341): On or about September 20, 2018, Viku Mehta, employee of ROBERT WILLIAMS, submitted an annual business filing for University PREP Charter (C4161006).

OVERT ACT NO. (342): On or about September 20, 2018, the annual business filing for University PREP Charter (C4161006) listed Jessica Bulk as the Secretary and Lambert Sikkema as the CFO.

OVERT ACT NO. (343): On or about September 20, 2018, Jessica Bulk and Lambert Sikkema were unaware their names were used on corporate documents.

OVERT ACT NO. (344): On or about November 8, 2018 JUSTIN SCHMITT submitted a 20 Day Attendance Data Certification for University Prep to the California Department of Education as the Charter School Representative.

CHARGES (cont'd)

OVERT ACT NO. (345): On or about February 24, 2019, the CDE information page for University Prep listed ROBERT WILLIAMS as the Chief Business Official for University Prep.

UNIVERSITY PREP SAN BERNARDINO

OVERT ACT NO. (346): On or about November 8, 2018 RICHARD NGUYEN submitted a 20 Day Attendance Data Certification for University Prep San Bernardino as the Charter School Representative.

OVERT ACT NO. (347): On or about April 16, 2018, the charter petition for University PREP San Bernardino designated ELI JOHNSON as the lead petitioner and contact for the charter school to Trona Joint Unified School District.

OVERT ACT NO. (348): On or about July 2, 2018, Viku Mehta, an employee of ROBERT WILLIAMS registered University PREP San Bernardino Charter School (C4170889) as a non-profit corporation.

UNIVERSITY PREP FRESNO:

OVERT ACT NO. (349): On or about March 29, 2018, the charter petition for University Prep Fresno listed Fernando Napoles as the lead petitioner and contact for the school to the Raisin City Elementary School District.

CALIFORNIA VANGUARD ACADEMY FRESNO:

OVERT ACT NO. (350): On or about May 1, 2018, the charter petition for California Vanguard Academy-Fresno identified Fernando Napoles as the lead petitioner and contact person for the charter school to the Raisin City Elementary School District.

COUNT 6 - CONSPIRACY TO COMMIT A CRIME

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JUSTIN KENT SCHMITT, JASON ALAN SCHROCK, ELI RALPH JOHNSON, RICHARD BA NGUYEN, STEVEN BRAIN ZANT, and ROBERT JOHN WILLIAMS did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Grand Theft, PC 487, Charging for services not provided to facilitate transferring public funds to business entities owned/operate by Sean McManus and Jason Schrock, in violation of PENAL CODE SECTION 182(a)(1).

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

CHARGES (cont'd)

The object of the conspiracy was to generate public funds from charter schools under their control and misappropriate those funds by transferring them to private companies operated and/or owned by Conspirators under cover of providing educational and instructional services when no such services were provided by those companies. Conspirators themselves, and through subordinates courted small school districts across California who were suffering budget woes and requested they authorize charter schools as a means to generate additional state funding for the district in the form of oversight fees. Conspirators took measures to disguise their relationship as manager and operator of both the charter schools and private vendors and charter management organizations. Conspirators, while in total control of all of the finances for the charter schools, invoiced to the charter schools and paid out to companies they owned and controlled for educational and instructional services that were not provided.

Academics Arts and Action Charter Academy dba A3 Education

OVERT ACT NO. (1): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Academics Arts and Action Charter Academy which does business as A3 Education.

OVERT ACT NO. (2): On or about and between January 1, 2017 and February 11, 2019, A3 Education invoiced charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles, for a total of \$25,931,423.52.

OVERT ACT NO. (3): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK operated and controlled CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles at such time when they contracted with A3 Education.

OVERT ACT NO. (4): On or about and between January 1, 2017 and February 11, 2019, funds paid from A3 Education business account's payroll were primarily paid to SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (5): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from A3 Education to CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

OVERT ACT NO. (6): On or about and between January 1, 2017 and February 11, 2019, A3 Education's business bank account that received the paid portions of the invoices did not show business expenses equivalent to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

CHARGES (cont'd)

OVERT ACT NO. (7): On or about and between January 1, 2017 to February 11, 2019, expenses for services allegedly provided on invoices from A3 Education to the charter schools such as instructional services, marketing, IT Services, and CALPADS, were actually paid for from the charter school bank accounts separate from the payments to A3 Education.

OVERT ACT NO. (8): On or about February 17, 2015, SEAN MCMANUS and JASON SCHROCK filed CA business file C3757752 with EIN#47-5353078 under the complete name Academics, Arts and Action Charter Academies (A3 Education) for the stated purpose to "operate public charter schools".

OVERT ACT NO. (9): In or around February 2015, the Form 990 for A3 Education lists Marc Veldhuizen as the chairman of A3 Education. Marc Veldhuizen is the brother-in-law of JASON SCHROCK.

OVERT ACT NO. (10): On October 20, 2015, SEAN MCMANUS placed his newly opened Farmers & Merchants bank account under the name Academics, Arts and Action Charter Academy (A3 Education).

OVERT ACT NO. (11): On October 20, 2015, SEAN MCMANUS was designated as the acting CEO/Secretary of A3 Education on the Farmers & Merchants bank account (270**1).

OVERT ACT NO. (12): On or about September 7, 2016, JASON SCHROCK was added as the only other authorized signer for the A3 Education bank account at Farmers & Merchants Bank #270****1.

OVERT ACT NO. (13): On or about September 7, 2016, documents for bank account #270****1 at Farmers & Merchants Bank identified SEAN MCMANUS as an employee of California Prep.

OVERT ACT NO. (14): On or about September 7, 2016, documents for bank account #270****1 at Farmers & Merchants Bank identified JASON SCHROCK as an employee of A3 Education.

OVERT ACT NO. (15): On or about September 7, 2016, the A3 Education Board approved a resolution authorizing the opening of Farmers & Merchants Bank account #270****1 for A3 Education and listed SEAN MCMANUS as the President/Secretary for both the account and the non-profit.

OVERT ACT NO. (16): On or about September 7, 2016, the A3 Education Board approved a resolution authorizing the opening of Farmers & Merchants Bank account #270****1 for A3 Education and listed JASON SCHROCK as an authorized signer on the account.

OVERT ACT NO. (17): In or around and between October 2016 and May 2017, SEAN MCMANUS directed Sarah Browne, former employee of Robert Williams, to not tell anyone how much money A3 Education makes or his salary from A3 Education when she was assigned to work in operations for the charter schools.

OVERT ACT NO. (18): On or about January 12, 2017, JASON SCHROCK directed Angela Slepak to not show A3 financials to Damien Jenkins or anyone within the organization, stating "Please only show financials of A3 to Sean and Jason. Do not pass the financials of A3 out to anyone else at this time. Thanks!"

CHARGES (cont'd)

OVERT ACT NO. (19): On or about March 10, 2017, an annual business filing for A3 Education (C3757752) listed SEAN MCMANUS as CEO/Secretary of the corporation.

OVERT ACT NO. (20): On or about March 10, 2017, an annual business filing for A3 Education (C3757752) listed JASON SCHROCK as CFO of the corporation.

OVERT ACT NO. (21): On or about March 10, 2017, an annual business filing for A3 Education (C3757752) listed 3300 Irvine Ave, Suite #330, Newport Beach, CA 92660 as its corporate address.

OVERT ACT NO. (22): In or around December 2017, SEAN MCMANUS and JASON SCHROCK wired \$1,622,718.43 from A3 Education for Global Consulting Services to purchase a private residence for SEAN MCMANUS in San Juan Capistrano.

OVERT ACT NO. (23): In or around December 2017, SEAN MCMANUS and JASON SCHROCK held title to the San Juan Capistrano as joint tenants, after purchasing the property with A3 Education funds.

OVERT ACT NO. (24): On or about January 1, 2018, SEAN MCMANUS sought to refinance the house he purchased with A3 Education Funds and take out \$1,000,000; but was ultimately denied.

OVERT ACT NO. (25): A3 Agreements in existence identify A3 Education as the Sole Statutory Member of the Charter Schools.

OVERT ACT NO. (26): On or about April 10, 2018, JASON SCHROCK texted Jim Konantz about what board members to use on upcoming charters.

OVERT ACT NO. (27): On or about November 11, 2017, SEAN MCMANUS texted Nyla Crider and directed her to describe A3 Education as “vendors” when speaking of A3 Education’s role to Valiant.

OVERT ACT NO. (28): On or about November 11, 2017, Nyla Crider texted SEAN MCMANUS that she told other people A3 Education was a management company.

OVERT ACT NO. (29): On or about November 11, 2017, SEAN MCMANUS responded to Nyla Crider, stating he never understood why people got “wound up” about the management company side of things.

OVERT ACT NO. (30): SEAN MCMANUS stating people got wound up about the management company side of things because SEAN MCMANUS friend’s Nick and Steve had ruined it.

OVERT ACT NO. (31): On or about November 11, 2017, SEAN MCMANUS texted Nyla Crider responding “thankfully we run a tight ship.”

OVERT ACT NO. (32): On or about and between July 1, 2017 and July 1, 2018, SEAN MCMANUS directed Luiz Rigney to not mention A3 Education when he was seeking authorization from school districts.

CHARGES (cont'd)

A3 CONSULTING:

OVERT ACT NO. (33): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled A3 Consulting.

OVERT ACT NO. (34): On or about and between January 1, 2017 and February 11, 2019, A3 Consulting invoiced charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles for a total of \$44,022,947.48.

OVERT ACT NO. (35): On or about and between January 1, 2017 and February 11, 2019 the large majority of invoices from A3 Consulting to CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles stated the services provided were either Educational Services or Instructional Services.

OVERT ACT NO. (36): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK operated and controlled CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles at such time when they contracted with A3 Consulting.

OVERT ACT NO. (37): On or about August 14, 2018, Sean Joseph McManus and Jason Schrock opened a bank account in the name of A3 Consulting at Farmers & Merchants bank (270****1).

OVERT ACT NO. (38): On or about August 14, 2018, Sean McManus and Jason Schrock submitted a 'board resolution' to Farmers & Merchants bank in support of opening the bank account (270****1) which listed Sean McManus as the President/CEO of A3 Consulting and Jason Schrock as the Secretary of A3 Consulting.

OVERT ACT NO. (39): On or about August 13, 2018, Jason Schrock wrote, signed and submitted a letter to Farmers & Merchants bank, in support of opening the account (270****1) stating "This business is set up for operations outside of California and we would like to have this bank account opened as of 8-12-18". The letter listed Sean McManus and Jason Schrock on behalf of A3 Consulting Inc.

OVERT ACT NO. (40): On or about June 25, 2018, Sean McManus signed and submitted nine (9) W9 forms for A3 Consulting to charter school accounts within Bill.com for funding purposes.

OVERT ACT NO. (41): On or about and between January 1, 2017 and February 11, 2019, A3 Consulting's business bank account that received the paid portions of the invoices did not show business expenses equivalent to invoices including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

CHARGES (cont'd)

OVERT ACT NO. (42): On or about and between January 1, 2017 to February 11, 2019, expenses for services allegedly provided on invoices from A3 Consulting to the charter schools such as instructional services, marketing, IT Services, and CALPADS were paid for from the charter school bank accounts separate from payments to A3 Consulting.

OVERT ACT NO. (43): On or about November 14, 2017, A3 Consulting (WY-2017-000776260) was registered as a for-profit corporation in the State of Wyoming.

OVERT ACT NO. (44): On or about November 14, 2017, A3 Consulting (WY-2017-000776260) listed: 1712 Pioneer Ave, Suite 500, Cheyenne, Wy 82001.

OVERT ACT NO. (45): On or about November 14, 2017, A3 Consulting (WY-2017-000776260) listed only ROBERT WILLIAMS as a board member.

OVERT ACT NO. (46): On or about October 23, 2018, A3 Consulting (WY-2017-000776260) submitted an annual filing.

OVERT ACT NO. (47): On or about October 23, 2018, annual business filing for A3 Consulting (WY-2017-000776260) listed ROBERT WILLIAMS as the sole officer (Treasurer).

OVERT ACT NO. (48): On or about October 23, 2018, annual business filing for A3 Consulting (WY-2017-000776260) used 1712 Pioneer Ave, Suite 500, Cheyenne, Wy 82001 as the corporate address.

OVERT ACT NO. (49): On or about December 27, 2018, A3 Consulting wired \$3,000,000 to Sean and Juliane McManus' 2018 Charitable Lead Annuity Trust (CLAT) account.

OVERT ACT NO. (50): On or about December 27, 2018, A3 Consulting wired \$1,200,000 to Jason and Sara Schrock's 2018 Charitable Lead Annuity Trust (CLAT) account controlled by JASON SCHROCK.

GLOBAL CONSULTING SERVICES:

OVERT ACT NO. (51): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Global Consulting Services.

OVERT ACT NO. (52): On or about and between January 1, 2017 and February 11, 2019, Global Consulting Services invoiced Charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles for a total of \$11,743,400.00.

CHARGES (cont'd)

OVERT ACT NO. (53): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK operated and controlled CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma, CA STEAM Sonoma II, California Academy of Sports Science, Uplift California North, Uplift California South, Uplift Santa Barbara, University Prep, Uplift Monterey, Valiant Prep Academy Southern California, Valiant Santa Barbara, and Valiant Academy Los Angeles at such time when they contracted with Global Consulting Services.

OVERT ACT NO. (54): On or about and between January 1, 2017 and February 11, 2019, Global Consulting Service's business bank account that received the paid portions of the invoices do not show business expenses sufficient to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (55): On or about November 7, 2016, JASON SCHROCK and SEAN MCMANUS registered Global Consulting Services, Inc. with the State of Wyoming as a for-profit corporation (2016-000731832) with the State of Wyoming.

OVERT ACT NO. (56): On or about November 7, 2016, JASON SCHROCK was listed as the President/SECRETARY of Global Consulting Services, Inc. on business filings with the State of Wyoming.

OVERT ACT NO. (57): On or about November 7, 2016, SEAN MCMANUS was listed as the CEO for the Global Consulting Services, Inc. on business filings with the State of Wyoming.

OVERT ACT NO. (58): On or about February 17, 2017, SEAN MCMANUS and JASON SCHROCK opened Farmers & Merchants bank account (270****4) for Global Consulting Services.

OVERT ACT NO. (59): On or about February 17, 2017, SEAN MCMANUS used the Wyoming address to open Farmers & Merchants bank account (270****4) for Global Consulting Services.

OVERT ACT NO. (60): On or about February 17, 2017, SEAN MCMANUS listed his employer as California Prep on bank filings to open Farmers & Merchants bank account (270****4) for Global Consulting Services.

OVERT ACT NO. (61): On or about February 17, 2017, JASON SCHROCK listed his employer as A3 Education on bank filings to open Farmers & Merchants bank account (270****4) for Global Consulting Services.

OVERT ACT NO. (62): On or about February 17, 2017, JASON SCHROCK filled out and signed a certification while opening Farmers & Merchants bank account (270****4) for Global Consulting Services stating they would not be conducting any business within the State of California.

OVERT ACT NO. (63): On or about February 17, 2017, JASON SCHROCK filled out and signed a certification while opening Farmers & Merchants bank account (270****4) stating Global Consulting Services is "closely related to our California Charter Schools."

OVERT ACT NO. (64): On or about September 19, 2017, Global Consulting Services (2016-000731832) submitted an annual filing to Wyoming as a for-profit company.

CHARGES (cont'd)

OVERT ACT NO. (65): On or about September 19, 2017, Global Consulting Services (2016-000731832) business filing listed JASON SCHROCK as he President/Director/Treasurer in the annual filing.

OVERT ACT NO. (66): On or about and between September 30, 2017 – February 8, 2019, Global Consulting Services contracted with California STEAM Sonoma II resulting in invoices totaling \$5,190,888.

OVERT ACT NO. (67): On or about October 23, 2018, Global Consulting Services (WY-2016-000731832) submitted an annual filing listing JASON SCHROCK as the sole officer.

OVERT ACT NO. (68): On or about October 23, 2018, business filing for Global Consulting Services (WY-2016-000731832) listed 1712 Pioneer Ave, Suite 500, Cheyenne, Wy 82001 as its address.

OVERT ACT NO. (69): On or about October 23, 2018, business filing for Global Consulting Services (WY-2016-000731832) listed JASON SCHROCK was listed as the President/Director/Treasurer.

OVERT ACT NO. (70): On or about June 20, 2018, Global Consulting Services wired \$750,000 to the JASON SCHROCK.

OVERT ACT NO. (71): On or about June 21, 2018, Global Consulting Services wired \$750,000 to Juliane Spilker-McManus' National Australia Bank account who is the wife of SEAN MCMANUS.

OVERT ACT NO. (72): On or about November 16, 2018, Global Consulting Services wired \$1,000,000 to SEAN MCMANUS' National Australia Bank account.

OVERT ACT NO. (73): On or about November 16, 2018, Global Consulting Services wired \$200,000 to JASON SCHROCK.

OVERT ACT NO. (74): On or about December 3, 2018, Global Consulting Services wired \$500,000 to Jason and Sara Schrock's 2018 Charitable Lead Annuity Trust (CLAT) account controlled by JASON SCHROCK.

OVERT ACT NO. (75): On or about December 4, 2018, Global Consulting Services wired \$500,000 to JASON SCHROCK.

OVERT ACT NO. (76): On or about December 29, 2018, Global Consulting Services wired \$282,000 to the McManus 2017 Charitable Trust Account.

OVERT ACT NO. (77): On or about February 7, 2019, Global Consulting Services wired \$250,000 to Rowan Patrick McManus' National Australia Bank account.

MAD DOG MARKETING:

CHARGES (cont'd)

OVERT ACT NO. (78): On or about and between January 1, 2017 and February 11, 2019, SEAN MCMANUS and JASON SCHROCK, operated and controlled Mad Dog Marketing.

OVERT ACT NO. (79): On or about and between January 1, 2017 and February 11, 2019, Mad Dog Marketing invoiced charter schools, CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma II, California Academy of Sports Science, Uplift North, Uplift Santa Barbara, Uplift South, University Prep, Uplift California Charter School, Valiant Prep Academy Southern California, Valiant Santa Barbara for a total of \$1,605,000.00.

OVERT ACT NO. (80): On or about and between January 1, 2017 to February 11, 2019, SEAN MCMANUS and JASON SCHROCK operated and controlled CA STEAM San Bernardino, CA STEAM Santa Barbara, CA STEAM Sonoma II, California Academy of Sports Science, CSSB Uplift North, CSSB Uplift Santa Barbara, CSSB Uplift South, University Prep, Uplift California Charter School, Valiant Prep Academy Southern California, Valiant Santa Barbara at such time when they contracted with Mad Dog Marketing.

OVERT ACT NO. (81): On or about and between January 1, 2017 to February 11, 2019, Mad Dog Marketing's business bank account that received the paid portions of the invoices do not show business expenses sufficient to invoices: including payroll, benefits, utilities, rent, or other expenses a typical business would incur to provide educational services.

OVERT ACT NO. (82): On or about November 14, 2017, Mad Dog Marketing (WY-2017-000776273) was registered as a for-profit corporation in the State of Wyoming.

OVERT ACT NO. (83): On or about November 14, 2017, business filing for Mad Dog Marketing listed 1712 Pioneer Ave, Suite 500, Cheyenne, Wy 8200 as its corporate address.

OVERT ACT NO. (84): On or about November 14, 2017, business filing for Mad Dog Marketing listed ROBERT WILLIAMS as a board member.

OVERT ACT NO. (85): On or about August 15, 2018, Sean McManus and Jason Schrock opened a Farmers and Merchants bank account (270****8) in the name of Mad Dog Marketing Inc.

OVERT ACT NO. (86): On or about August 17, 2018 Sean McManus and Jason Schrock signed and submitted a board resolution for Mad Dog Marketing Inc, in support of opening the Farmers and Merchants bank account (270****8).

OVERT ACT NO. (87): On or about August 13, 2018 Jason Schrock wrote, signed and submitted a letter to Farmers and Merchants bank, in support of opening the account (270****8) stating "This business is set up for operations outside of California and we would like to have this bank account opened as of 8-13-18". The letter listed Sean McManus and Jason Schrock on behalf of Mad Dog Marketing Inc.

CHARGES (cont'd)

OVERT ACT NO. (88): On or about August 14, 2018, Sean McManus signed and submitted nine (9) W9 forms for Mad Dog Marketing to charter school accounts within Bill.com for funding purposes. On or about October 23, 2018, Mad Dog Marketing INC, (WY-2017-000776273) submitted an annual filing for a for-profit corporation in the State of Wyoming.

OVERT ACT NO. (89): On or about October 23, 2018, business filing for Mad Dog Marketing INC, (WY-2017-000776273) listed 1712 Pioneer Ave, Suite 500, Cheyenne, Wy 82001 as its address.

OVERT ACT NO. (90): On or about October 23, 2018, business filing for Mad Dog Marketing INC, (WY-2017-000776273) listed ROBERT WILLIAMS as the only board member.

OVERT ACT NO. (91): On or about February 7, 2019, Mad Dog Marketing wired \$250,000 to Rowan Patrick McManus' National Australia Bank account.

AETERNO PARTNERS

OVERT ACT NO. (92): On or about and between October 7, 2016 to February 11, 2019, JASON SCHROCK and his wife owned Aeterno Partners, LLC.

OVERT ACT NO. (93): On or about October 7, 2016, JASON SCHROCK registered Aeterno Partners Group, Inc. (C3952491) with the State of California as a for-profit corporation.

OVERT ACT NO. (94): On or about October 27, 2016, Aeterno Partners Group (C3952491) filed an adjusted registration with the State of California as a non-profit with JASON SCHROCK adding his wife Sara Schrock and daughter Sophia Schrock to the registration.

OVERT ACT NO. (95): On or about January 26, 2017, JASON SCHROCK opened Farmers & Merchants bank account (270****7) for Aeterno Partners.

OVERT ACT NO. (96): On or about January 26, 2017, documents for Farmers & Merchants bank account (270****7) for Aeterno Partners listed JASON SCHROCK's employer as A3 Education.

OVERT ACT NO. (97): On or about August 10, 2017, Aeterno Partners Group (C3952491) submitted an annual filing with the State of California where JASON SCHROCK still used his personal address and listed himself as the CEO, and his wife Sara Schrock is listed as the CFO.

OVERT ACT NO. (98): On or about August 10, 2017, Aeterno Partners Group (C3952491) submitted an annual filing with the State of California where he added daughter, Sophia Schrock as the Secretary.

OVERT ACT NO. (99): On or about April 12, 2018, JASON SCHROCK emailed ROBERT WILLIAMS regarding his taxes for Aeterno Partners and indicated "all money in this account was first paid to Global Consulting Services, and transferred over the Aeterno Partners Group... It's simply a name on a bank account. (Please call to discuss)."

CHARGES (cont'd)

OVERT ACT NO. (100): On or about August 8, 2018, Viku Mehta submitted an annual business filing for Aeterno Partners Group, inc (C3952491).

OVERT ACT NO. (101): On or about August 8, 2018, annual business filing for Aeterno Partners Group removed JASON SCHROCK from the documents.

OVERT ACT NO. (102): On or about August 18, 2018, JASON SCHROCK, Sara Schrock, and Sophia Schrock are replaced on filings related to Aeterno Partners with Viku Mehta.

OVERT ACT NO. (103): On or about September 12, 2017, Global Consulting Services issued a check to Aeterno Partners, LLC for \$225,000.

OVERT ACT NO. (104): On or about December 6, 2017, Global Consulting Services transferred \$146,434.39 to Aeterno Partners, LLC.

OVERT ACT NO. (105): On or about March 6, 2018, Aeterno Partners, LLC wired \$35,000 to SSB Farms Inc.

OVERT ACT NO. (106): On or about March 7, 2018, Aeterno Partners, LLC wired \$125,000 to SSB Farms Inc.
DALKIETH CONSULTING:

DALKIETH CONSULTING

OVERT ACT NO. (107): On or about and between November 10, 2015 to February 11, 2019, SEAN MCMANUS and his wife owned Dalkieth Consulting, LLC.

OVERT ACT NO. (108): On or about November 10, 2015, Dana Kislig, Esq. filed an annual statement of information for Dalkeith Consulting, LLC (2015-30010203).

OVERT ACT NO. (109): On or about November 10, 2015, business filing for Dalkeith Consulting LLC (2015-30010203) listed SEAN MCMANUS as the CEO and Manager of the LLC.

OVERT ACT NO. (110): On or about November 10, 2015, business filing for Dalkeith Consulting lists SEAN MCMANUS' personal address as the address for the company.

OVERT ACT NO. (111): November 6, 2017, Dalkeith Consulting, LLC (2015-30010203) submitted an annual updated LLC filing.

OVERT ACT NO. (112): On or about November 6, 2017, Dalkeith Consulting, LLC (2015-30010203) listed SEAN MCMANUS as the CEO, Manager and registered agent for the LLC.

OVERT ACT NO. (113): On or about November 6, 2017, Dalkeith Consulting, LLC (2015-30010203) business filing listed 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as the corporate address.

CHARGES (cont'd)

OVERT ACT NO. (114): On or about November 29, 2016, A3 Education issued a check to Dalkeith Consulting for \$175,000.

OVERT ACT NO. (115): On or about December 9, 2016, A3 Education issued a check to Dalkeith Consulting for \$13,000.

OVERT ACT NO. (116): On or about 21, 2016, Dalkeith Consulting wired \$235,000 to SEAN MCMANUS' National Australia Bank account.

OVERT ACT NO. (117): On or about May 30, 2017, A3 Education issued a check to Dalkeith Consulting for \$375,000.

CAL PREP SUTTER CHARTER SCHOOLS (K-7 / 8-12).

OVERT ACT NO. (118): On or about March 16, 2015, Elevate California C3625043 (aka: CA PREP Sutter Charter Schools) filed articles to change their name to The Preparatory & Flex Charter Academies of California listing SEAN MCMANUS as the Secretary.

OVERT ACT NO. (119): On or about March 16, 2015, Elevate California C3625043 (aka: CA PREP Sutter Charter Schools) filed articles to change their name to The Preparatory & Flex Charter Academies of California listing Rita Reece as the President.

OVERT ACT NO. (120): In or around July, 2015, SEAN MCMANUS and Rita Reese sought and obtained authorization for California Prep Sutter K-7 and California Prep Sutter 8-12 from the Meridian Elementary School District.

OVERT ACT NO. (121): On or about July 22, 2015, The Preparatory & Flex Charter Academies of California filed name change document to California Prep Sutter Charter Schools (C3625043) listing SEAN MCMANUS as the Secretary.

OVERT ACT NO. (122): On or about July 22, 2015, The Preparatory & Flex Charter Academies of California filed name change documents to California Prep Sutter Charter Schools (C3625043) listing Rita Reese as the President.

OVERT ACT NO. (123): On or about Sept, 15 2015, SEAN MCMANUS opened a bank account with California Credit Union in the name 'California Prep Sutter Charter Schools (account #709*****8).

OVERT ACT NO. (124): On or about Sept, 15 2015, SEAN MCMANUS opened a second bank account with California Credit Union in the name 'California Prep Sutter Charter Schools (account #709*****1).

OVERT ACT NO. (125): On or about October 20, 2015, SEAN MCMANUS opened a Farmers & Merchants bank account(270***), using his personal address as the company address while listing his employer as Cal Prep.

CHARGES (cont'd)

OVERT ACT NO. (126): On or about November 23, 2015 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal PREP Sutter K-7 certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (127): On or about January 1, 2016, SEAN MCMANUS opened up California Credit Union account #7094****1- California CA PREP Sutter Charter Schools using his personal address.

OVERT ACT NO. (128): On or about January 1, 2016, SEAN MCMANUS opened up California Credit Union account #7094****8- California CA PREP Sutter Charter Schools using his personal address.

OVERT ACT NO. (129): On or about January 29, 2016, Credit limits were increased for California Credit Union accounts #7094****1 and 7094****8 for California CA PREP Sutter Charter Schools which listed SEAN MCMANUS as administrator Secretary and JASON SCHROCK and Eric Johnson as board member.

OVERT ACT NO. (130): On or about June 30, 2016, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing JASON SCHROCK as a board member.

OVERT ACT NO. (131): On or about June 30, 2016, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing SEAN MCMANUS as CEO of the nonprofit corporation.

OVERT ACT NO. (132): On or about July 11, 2016, California Credit Union account #7094****1 - associated with California CA PREP Sutter Charter Schools and SEAN MCMANUS added ROBERT WILLIAMS as a new authorizer on the account.

OVERT ACT NO. (133): In or around December, 2017, Chris Thibodeau of Squar Milner, when conducting an annual independent audit of Cal Prep Sutter Charter Schools, expressed a concern about the Cal Prep Sutter Charter Schools relationship with A3 Education, Global Consulting Services and potential fraud.

OVERT ACT NO. (134): On or around December 12, 2017, around 10:55 p.m., in response to concerns from auditor Chris Thibodeau JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of Cal Prep Sutter Board Minutes from June 25, 2015, that did not state vendor contract for services were discussed at the meeting.

OVERT ACT NO. (135): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter K-7 and A3 Education.

OVERT ACT NO. (136): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter 8-12 and A3 Education.

OVERT ACT NO. (137): On or around December 12, 2017, around 10:55 p.m., JASON SCHROCK provided SEAN MCMANUS and ROBERT WILLIAMS with a copy of a Management Agreement between Cal Prep Sutter 8-12 and Global Consulting Services.

CHARGES (cont'd)

OVERT ACT NO. (138): On or about December 13, 2017, around 9:19 a.m., ROBERT WILLIAMS emailed Viku Meta and directed him to print out the documents provided by JASON SCHROCK on December 12, 2017.

OVERT ACT NO. (139): On or about December 13, 2017, around 9:39 a.m., ROBERT WILLIAMS forwarded concern expressed by Viku Meta to JASON SCHROCK that the Global Consulting services agreement pages were not legible.

OVERT ACT NO. (140): On or about December 13, 2017, around 9:40 a.m., ROBERT WILLIAMS emailed JASON SCHROCK "The minutes or agenda does not refer to approving A3 contract."

OVERT ACT NO. (141): On or about December 13, 2017, around 9:42 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "I'm on the road...can you have Viku make some changes that you need fixed?"

OVERT ACT NO. (142): On or about December 13, 2017, around 9:45 a.m., ROBERT WILLIAMS emailed JASON SCHROCK "No has to come from you without Viku his knowledge These are Board minutes."

OVERT ACT NO. (143): On or about December 13, 2017, around 10:02 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "I'll call you in a little bit what do you need change?"

OVERT ACT NO. (144): On or about December 13, 2017, around 10:03 a.m., JASON SCHROCK emailed ROBERT WILLIAMS "Ok I will go back and fix them."

OVERT ACT NO. (145): On or about December 13, 2017 around 10:05 a.m., ROBERT WILLIAMS emailed JASON SCHROCK concerned that Schrock should not fabricate Board minutes for any meeting that Chris Thibodeau has access to the pre-existing minutes for, stating specifically "Problem is will they contradict anything they already have access to. Can't have two sets of minutes for a meeting."

OVERT ACT NO. (146): On or about December 13, 2017, around 10:30 a.m., JASON SCHROCK emailed ROBERT WILLIAMS new minutes for June 25, 2015, board minutes, now demonstrating that Vendor Contract for Services was approved by the Cal Prep Sutter Board via motion by Trustee Rita "Reece" whose actual name is Rita Reese.

OVERT ACT NO. (147): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of the June 25, 2015 Board minutes JASON SCHROCK revised.

OVERT ACT NO. (148): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of A3 Management Agreements with Cal Prep Sutter K-7 dated June 30, 2015 and electronically signed by "Rita Reece" who did not sign the documents and whose name is actually Rita Reese.

CHARGES (cont'd)

OVERT ACT NO. (149): On or about December 14, 2017, around 9:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS a copy of A3 Management Agreements with Cal Prep Sutter 8-12 dated June 30, 2015 and electronically signed by "Rita Reece" who did not sign the documents and whose name is actually Rita Reese.

OVERT ACT NO. (150): On or about December 14, 2017, around 10:11 p.m. SEAN MCMANUS emailed JASON SCHROCK a letter of resignation from Cal Prep Sutter stating that he resigned from CAL PREP Sutter effective June 30, 2016.

OVERT ACT NO. (151): On or about December 14, 2017, around 10:55 p.m., JASON SCHROCK emailed SEAN MCMANUS and ROBERT WILLIAMS with July 6, 2016 board meeting now demonstrating SEAN MCMANUS resigned from the charter school and ELI JOHNSON was promoted to the CEO.

OVERT ACT NO. (152): On or about December 15, 2017, around 2:34 p.m., JASON SCHROCK emailed Robert Sikma (Board President) ROBERT WILLIAMS, and SEAN MCMANUS "Please sign and send to the auditor. Eli... please make sure you read and are aware of this letter for us all to be on the same page and response should the auditor calls us again. Thank you sir!"

OVERT ACT NO. (153): On or about December 15, 2017, around 2:46 p.m., ROBERT WILLIAMS emailed JASON SCHROCK, "Did you make any changes? Did Eli read so he knows his responsibility when speaking to the auditor? Is it better to be in email form since the questions were email form. We don't want to elevate the correspondence to formal letters."

OVERT ACT NO. (154): On or about December 15, 2017, around 2:49 p.m., JASON SCHROCK emailed ROBERT WILLIAMS, Robert Sikma, SEAN MCMANUS, and ELI JOHNSON "I like the letter response."

OVERT ACT NO. (155): On or about December 15, 2017, around 3:03 p.m., ROBERT WILLIAMS emailed JASON SCHROCK, "Spoke to Rob You will respond to Chris's emails per an email and cc Eli on it. It will be done in 20 minutes."

OVERT ACT NO. (156): On or about December 15, 2017, around 3:56 p.m., ELI JOHNSON emailed ROBERT WILLIAMS, JASON SCHROCK, and Robert Sikma, "I have read and I am up to speed on the response from the board."

OVERT ACT NO. (157): On or about December 15, 2017, around 3:57 p.m., ELI JOHNSON emailed ROBERT WILLIAMS, JASON SCHROCK, and Robert Sikma "If Chris calls me I will let you know before calling him back."

OVERT ACT NO. (158): On or about December 15, 2017, around 3:57 p.m., SEAN MCMANUS emailed JASON SCHROCK, ELI JOHNSON, ROBERT WILLIAMS, and Robert Sikma, "Eli I think it would be best if you not speak to the auditor at this point, if he reaches out please contact Jason."

CHARGES (cont'd)

OVERT ACT NO. (159): On or about December 15, 2017, around 4:02 p.m., ELI JOHNSON emailed SEAN MCMANUS and ROBERT WILLIAMS, JASON SCHORK, and Robert Sikma, "Will do" taking a direct order from SEAN MCMANUS and demonstrating SEAN MCMANUS is the CEO of Cal Prep Sutter.

OVERT ACT NO. (160): On or about December 15, 2017, Robert Sikma emailed auditor Chris Thibodeau at the direction of SEAN MCMANUS, JASON SCHROCK, and ROBERT WILLIAMS that contained false statements meant to shield payments made to A3 Education and Global Consulting Services and the relationship between SEAN MCMANUS and Cal Prep Sutter Charter Schools.

OVERT ACT NO. (161): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "Mr. Eli Johnson is the CEO of California Prep Sutter" when ELI JOHNSON takes direct orders from SEAN MCMANUS and JASON SCHROCK.

OVERT ACT NO. (162): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "Within Eli's role as CEO, he is responsible for the review of the financial statements and audit information."

OVERT ACT NO. (163): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "All payments made to A3 and Global Consulting have been appropriately approved per the process mentioned above. The Memorandum of Understanding between A3 and the school and Global Consulting and the school have been reviewed and approved by the Board of Directors, see enclosed board minutes"

OVERT ACT NO. (164): On or about December 15, 2017 Robert Sikma's letter to auditor Chris Thibodeau stated "The American Express card is in the name of SEAN MCMANUS. However, RICHARD NGUYEN, the business manager is in possession of this card and authorizes the purchases."

OVERT ACT NO. (165): On or about December 15, 2017 Robert Sikma forwarded his letter to auditor Chris Thibodeau to JASON SCHROCK, ROBERT WILLIAMS, and ELI JOHNSON and indicated he did so to ensure "we are all on the same page."

OVERT ACT NO. (166): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools dated June 30, 2017 based on documentation provided by SEAN MCMANUS, JASON SCHROCK, and/or their subordinates.

OVERT ACT NO. (167): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools and in the audit, reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (168): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing JASON SCHROCK as a board member.

OVERT ACT NO. (169): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing SEAN MCMANUS as CEO.

CHARGES (cont'd)

OVERT ACT NO. (170): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (171): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools listing ELI JOHNSON as the administrator of the school.

OVERT ACT NO. (172): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools identifying that the charter school engaged in related party transactions with SEAN MCMANUS.

OVERT ACT NO. (173): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter lacked internal controls because the school used check disbursements from "a signature of an individual that is not involved in management or the Board of Directors."

OVERT ACT NO. (174): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter did not provide evidence that journal entries and invoices were reviewed and authorized, as evidenced by initial or signature.

OVERT ACT NO. (175): On or around January 12, 2018, Squar Milner LLP submitted an annual audit of CA PREP Sutter Charter Schools finding that Cal Prep Sutter did "not provide documentation to support several invoices and journal entries."

OVERT ACT NO. (176): On or about February 9, 2017 SEAN MCMANUS directed ROBERT WILLIAMS and Angela Slepak to submit Statements of Information for Cal Prep Sutter and put ELI JOHNSON as the CEO.

OVERT ACT NO. (177): On or about February 15, 2017, ROBERT WILLIAMS submitted an annual business filing for CA PREP Sutter Charter Schools (C3625043) listing ELI JOHNSON as the CEO/SECRETARY/CFO.

OVERT ACT NO. (178): On or about February 15, 2017, CA PREP Sutter Charter Schools (C3625043) current business filings no longer show SEAN MCMANUS as the registered agent.

OVERT ACT NO. (179): On or about May 24, 2017, Angela Slepak, emailed auditor Chris Thibodeau "on behalf ROBERT WILLIAMS" requesting revisions to the Cal Prep Sutter K-7 and Cal Prep Sutter 8-12 audit Statement of Functional Expenses to falsely claim payments to A3 Education and Dalkieth Consulting were for teacher salaries.

OVERT ACT NO. (180): On or about May 24, 2017, email from Angela Slepak requested to reallocate payments of \$122,005.544 from Cal Prep Sutter K-7 from A3 Education to Certificated Salaries under Education Program Services.

OVERT ACT NO. (181): On or about May 24, 2017, email from Angela Slepak requested to reallocate payments of \$18,750 from Cal prep Sutter K-7 to Dalkieth Consulting to Certificated Salaries under Education Program Services.

CHARGES (cont'd)

OVERT ACT NO. (182): On or about May 24, 2017, email from Angela Slepak requested to reallocate payments of \$119,314.64 from Cal Prep Sutter 8-12 from A3 Education to Certificated Salaries under Education Program Services.

OVERT ACT NO. (183): On or about May 24, 2017, email from Angela Slepak requested to reallocate payments of \$18,750 from Cal prep Sutter 8-12 to Dalkieth Consulting to Certificated Salaries under Education Program Services.

OVERT ACT NO. (184): On or about May 25, 2017, Chris Thibodeau provided revised audits to ROBERT WILLIAMS with payments to A3 Education and Dalkieth Consulting reflected as teacher salaries.

OVERT ACT NO. (185): On or about May 26, 2017, ROBERT WILLIAMS provided revised audits to SEAN MCMANUS stating "Pages that were changes is Audit report Date, page 13 note and functional expenses pages 21 and 22 Still waiting on Eli's [ELI JOHNSON] signature to submit and auditor will submit today or Tuesday."

OVERT ACT NO. (186): In or around December 2018, CA PREP Sutter Charter Schools hired Jeffrey Hill instead of SquarMilner to conduct its annual audit after Squar Milner found related party transactions, and findings related to improper invoicing and payments.

OVERT ACT NO. (187): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (188): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018, and in the audit reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (189): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018 listed ELI JOHNSON as administrator of the school instead of SEAN MCMANUS.

OVERT ACT NO. (190): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018 listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (191): On or about December 21, 2018, Jeffery Hill submitted an annual audit for CA PREP Sutter Charter Schools (K-7/8-12) dated June 30, 2018 no longer listed JASON SCHROCK as a board member.

OVERT ACT NO. (192): On or about January 1, 2018, CA PREP SUTTER 8-12, CCU Account #709406381 began using 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as its address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (193): On or about August 17, 2018, Robert Williams submitted an annual business filing for CA PREP Sutter Charter Schools (C3625043) as the registered agent.

CHARGES (cont'd)

OVERT ACT NO. (194): On or about August 17, 2018, annual business filing for CA PREP Sutter Charter Schools (C3625043) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (195): On or about August 17, 2018, annual business filing for CA PREP Sutter Charter Schools (C3625043) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (196): In or around and between the November 2015 and April 30, 2019, ELI JOHNSON told Anne Sykes of Meridian Elementary School District that Cal Prep Sutter was the only charter school he worked with. CA STEAM SAN BERNARDINO:

OVERT ACT NO. (197): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM San Bernardino for \$12,830,203.

OVERT ACT NO. (198): Between January 1, 2017 to February 11, 2019, CA STEAM San Bernardino paid A3 Consulting \$1,626,208.

OVERT ACT NO. (199): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM San Bernardino for \$5,972,109.93.

OVERT ACT NO. (200): Between January 1, 2017 to February 11, 2019, CA STEAM San Bernardino paid A3 Education \$5,161,672.33.

OVERT ACT NO. (201): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM San Bernardino for \$1,902,088.

OVERT ACT NO. (202): Between January 1, 2017 to February 11, 2019, CA STEAM San Bernardino paid Global Consulting Services \$1,470,088.

OVERT ACT NO. (203): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM San Bernardino for \$300,000.

OVERT ACT NO. (204): Between January 1, 2017 to February 11, 2019, CA STEAM San Bernardino paid Mad Dog Marketing \$240,000.

OVERT ACT NO. (205): A management agreement exists between CA STEAM San Bernardino and A3 Education allegedly signed on October 25, 2015 signed by Marc Veldhuizen, JASON SCHROCK's brother in law, on behalf of A3, and Rob Sikma on behalf of CA STEAM San Bernardino.

OVERT ACT NO. (206): On or about and between January 2016 and August 2016, SEAN MCMANUS and ELI JOHNSON attended a Board meeting with the Trona Joint Unified School District to seek authorization from the District for CA STEAM San Bernardino.

CHARGES (cont'd)

OVERT ACT NO. (207): On or about March 11, 2016, SEAN MCMANUS registered a nonprofit corporation named California STEAM San Bernadino (C3884754) with the State of California.

OVERT ACT NO. (208): On or about July 1, 2016, ELI JOHNSON submitted a charter petition to and was granted authorization for CA STEAM San Bernardino by the Trona Joint Unified School District.

OVERT ACT NO. (209): On or about July 1, 2016, charter petition for CA STEAM San Bernardino listed ELI JOHNSON as lead petitioner and contact for the school to Trona Joint Unified School District.

OVERT ACT NO. (210): On or about July 27, 2016, SEAN MCMANUS and ELI JOHNSON opened Farmers & Merchants bank account (270****6) for CA STEAM San Bernardino.

OVERT ACT NO. (211): On or about July 27, 2016, Farmers & Merchants bank account (270****6) for CA STEAM San Bernardino used the address- 711 W. 17th St., Unit #E8, Costa Mesa, CA 92627.

OVERT ACT NO. (212): On or about July 27, 2016, Documents related to the Farmers & Merchants bank account (270****6) opened for CA STEAM San Bernardino, listed SEAN MCMANUS as an employee of California Prep.

OVERT ACT NO. (213): On or about July 27, 2016, Documents related to the Farmers & Merchants bank account (270****6) for CA STEAM San Bernardino, listed ELI JOHNSON as an employee of California Prep.

OVERT ACT NO. (214): On or about July 27, 2016, the CA STEAM San Bernadino Board authorized opening Farmers & Merchants bank account (270****6) and listed SEAN MCMANUS as the CEO/Secretary for the account.

OVERT ACT NO. (215): On or about July 27, 2016, the CA STEAM San Bernadino Board authorized opening Farmers & Merchants bank account (270****6) and listed ELI JOHNSON as an authorized signer for the account.

OVERT ACT NO. (216): On or about August 26, 2016, a 401k plan for CA STEAM San Bernardino listed SEAN MCMANUS as the President of CA STEAM San Bernardino.

OVERT ACT NO. (217): On or about September 15, 2016 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal STEAM San Bernardino certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (218): On or about October 5, 2016, Enriqueta Luquin (EDCBO) submitted an annual filing for California STEAM San Bernardino (C3884754) as a non-profit with the State of California, listing the charter's address as 711 17th st, Unit 8E, Costa Mesa, CA 92627.

OVERT ACT NO. (219): On or about October 5, 2016, California STEAM San Bernardino (C3884754) annual filing listed SEAN MCMANUS as the CEO/SECRETARY/CFO.

OVERT ACT NO. (220): On or about January 13, 2017, Damian Jenkins public profile was that of an employee of A3 Education performing accreditation services.

CHARGES (cont'd)

OVERT ACT NO. (221): On or about January 13, 2017, Damian Jenkins began being paid by CA STEAM San Bernardino for her services covering more than just CA STEAM San Bernardino.

OVERT ACT NO. (222): On or about and between January 13, 2017 and February 11, 2019, Damien Jenkins did not receive pay from A3 Education.

OVERT ACT NO. (223): On or about March 31, 2017, JUSTIN SCHMITT of A3 Education began getting paid out of CA STEAM San Bernardino accounts.

OVERT ACT NO. (224): On or about March 31, 2017, JUSTIN SCHMITT public profile was that of an employee of A3 Education working for multiple charter schools.

OVERT ACT NO. (225): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (226): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2017, and in the audit reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (227): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2017, reviewed and confirmed the school complied with attendance accounting laws.

OVERT ACT NO. (228): On or about December 8, 2017, Jeffrey Hill submitted an audit for CA STEAM San Bernardino dated June 30, 2017 and listed ELI JOHNSON as the Administrator of the school.

OVERT ACT NO. (229): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates

OVERT ACT NO. (230): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, and in the audit reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (231): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (232): On or about January 7, 2019, Jeffery Hill submitted an annual audit for CA STEAM San Bernardino dated June 30, 2018, listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (233): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for CA STEAM San Bernardino (C3884754).

CHARGES (cont'd)

OVERT ACT NO. (234): On or about August 17, 2018, annual business filing for CA STEAM San Bernardino (C3884754) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (235): On or about August 17, 2018, annual business filing for CA STEAM San Bernardino (C3884754) listed Robert Williams as the registered agent.

OVERT ACT NO. (236): On or about August 17, 2018, annual business filing for CA STEAM San Bernardino (C3884754) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

CA STEAM SONOMA/II:

OVERT ACT NO. (237): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM Sonoma for \$5,190,888.

OVERT ACT NO. (238): Between January 1, 2017 to February 11, 2019, CA STEAM Sonoma paid Global Consulting Services \$3,820,219.

OVERT ACT NO. (239): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM Sonoma for \$165,000.

OVERT ACT NO. (240): Between January 1, 2017 to February 11, 2019, CA STEAM Sonoma paid Mad Dog Marketing \$165,000.

OVERT ACT NO. (241): On or about February 17, 2015, Juliane Spilker (Wife of SEAN MCMANUS) registered with the State of California as a non-profit corporation, Academies of Science, Technology, Engineering, Arts and Mathematics (Academies of STEAM) (C3757657) using her and SEAN MCMANUS' shared address.

OVERT ACT NO. (242): On or about November 23, 2015 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for CA STEAM Sonoma certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (243): On January 1, 2016, SEAN MCMANUS opened up a California Credit Union account #7094***for Academies of STEAM, using his personal address.

OVERT ACT NO. (244): A management agreement exists between CA STEAM Sonoma and A3 Education allegedly signed on February 1, 2016 signed by Marc Veldhuizen, JASON SCHROCK's brother in law, on behalf of A3, and Rob Sikma on behalf of CA STEAM Sonoma.

OVERT ACT NO. (245): On or about March 11, 2016, SEAN MCMANUS registered a nonprofit corporation named California STEAM Sonoma (C3884753) with the State of California.

CHARGES (cont'd)

OVERT ACT NO. (246): On or about March 11, 2016 CA STEAM Sonoma Bylaws designated A3 Education as its Sole Statutory Member.

OVERT ACT NO. (247): On or about March 17, 2016, ELI JOHNSON submitted a charter petition to and was granted authorization for CA STEAM Sonoma by Liberty School District.

OVERT ACT NO. (248): On or about July 18, 2016, SEAN MCMANUS was identified as the "President" of California STEAM Sonoma on the American Funds Record keeping service account for "California STEAM 401k".

OVERT ACT NO. (249): On or about July 22, 2016, SEAN MCMANUS opened California Credit Union bank account #7094****8 for CA STEAM Sonoma with the address being SEAN MCMANUS's personal address.

OVERT ACT NO. (250): On or about July 22, 2016, Board minutes for CA STEAM Sonoma (dated 07/23/2016) listed JASON SCHROCK as a board member.

OVERT ACT NO. (251): On or about January 31, 2017 ROBERT WILLIAMS submitted an annual business filing for ACADEMIES of Science, Technology, Engineering, Arts and Mathematics (Academies of STEAM) (C3757657).

OVERT ACT NO. (252): On or about January 31, 2017 annual business filing for (Academies of STEAM) (C3757657) listed SEAN MCMANUS as the registered agent, CEO/SECRETARY/CFO.

OVERT ACT NO. (253): On or about February 15, 2017, Academies of STEAM (C3757657) business filing listed ELI JOHNSON instead of SEAN MCMANUS as the CEO/SECRETARY/CFO.

OVERT ACT NO. (254): On or about February 15, 2017, the Academies of STEAM (C3757657) address used remained 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (255): On or about February 15, 2017, CA STEAM Sonoma (C3884753) submitted the annual non-profit business filing listing ELI JOHNSON as the CEO/SECRETARY/CFO.

OVERT ACT NO. (256): On or about February 15, 2017, CA STEAM Sonoma (C3884753) removed SEAN MCMANUS as the registered agent.

OVERT ACT NO. (257): On or about February 15, 2017, CA STEAM Sonoma (C3884753) address remained 3300 Irvine Ave, Suite #330, Newport Beach, CA 92660, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (258): On or about April 10, 2017, ELI JOHNSON submitted and was approved a charter petition for CA STEAM SONOMA II by Guerneville Elementary School District.

OVERT ACT NO. (259): On or about April 10, 2017, charter petition for CA STEAM Sonoma II ELI JOHNSON as lead petitioner and contact for the school to Guerneville Elementary School District.

CHARGES (cont'd)

OVERT ACT NO. (260): On or about April 10, 2017, charter petition for CA STEAM Sonoma II listed Luiz Rigney, C Ceriman, ROBERT WILLIAMS, Eric Johnson, Darrin Erb and JASON SCHROCK as founding board members.

OVERT ACT NO. (261): On or about April 10, 2017, charter petition for CA STEAM Sonoma II included Articles of Incorporation for the Academies of STEAM (C3757657), which was opened by SEAN MCMANUS' wife Julian Spilker McManus (in her maiden name).

OVERT ACT NO. (262): On or about June 16, 2017, EDCBO entered into a services agreement with CA STEAM SONOMA II (C3884753) listing ELI JOHNSON as the School contact.

OVERT ACT NO. (263): On or around October 23, 2017, Liberty Elementary School District issued a Notice of Violation for CA STEAM Sonoma addressed to ELI JOHNSON.

OVERT ACT NO. (264): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma failed to meet generally accepted accounting principles when it overstated revenue by over a million dollars without explanation.

OVERT ACT NO. (265): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma "failed to provide the District with detailed attendance report."

OVERT ACT NO. (266): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma violated the Brown Act.

OVERT ACT NO. (267): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma violated the Brown Act.

OVERT ACT NO. (268): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma violated the Individuals with Disabilities Education Act.

OVERT ACT NO. (269): On or around October 23, 2017, Liberty Elementary School District's Notice of Violation addressed to ELI JOHNSON alleged that CA STEAM Sonoma violated the terms and conditions of its charter.

OVERT ACT NO. (270): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (271): On or about December 8, 2017, Jeffery Hill was not provided the Notice of Violation from CA STEAM Sonoma I prior to completing the annual audit for CA STEAM SONOMA dated June 30, 2017.

CHARGES (cont'd)

OVERT ACT NO. (272): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (273): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with attendance accounting laws

OVERT ACT NO. (274): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, listed Robert Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (275): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, listed ELI JOHNSON as the Administrator of the school.

OVERT ACT NO. (276): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM SONOMA dated June 30, 2017, listed ROBERT WILLIAMS as the CBO of the school.

OVERT ACT NO. (277): On or about January 19, 2018, CA STEAM SONOMA voluntarily closed in lieu of having their charter revoked by Liberty School District due to fiscal mismanagement and charter violations.

OVERT ACT NO. (278): On or about March 12, 2018, bank documents opening the California Credit Union bank account (#1193****4) for CA STEAM SONOMA listed 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as the corporate address CA STEAM Sonoma which is the address of Charter School Financial Systems, LLC and Williams

Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (279): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (280): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018 and in the audit, reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (281): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018 and in the audit found that CA STEAM Sonoma was not allowed to claim full attendance because it voluntarily closed in the middle of the school year and did not offer a full school years worth of education.

OVERT ACT NO. (282): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018 listed ELI JOHNSON as the administrator.

CHARGES (cont'd)

OVERT ACT NO. (283): On or about October 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma dated June 30, 2018 listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (284): On or about December 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma II dated June 30, 2018, and in the audit, reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (285): On or about December 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma II dated June 30, 2018, listed ELI JOHNSON as the administrator.

OVERT ACT NO. (286): On or about December 17, 2018, Jeffery Hill submitted an annual audit for CA STEAM Sonoma II dated June 30, 2018, listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (287): On or about and between July 1, 2018 – November 21, 2018, Mad Dog Marketing contracted with California STEAM Sonoma II resulting in invoices totaling \$165,000.

OVERT ACT NO. (288): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for CA STEAM Sonoma (C3884753).

OVERT ACT NO. (289): On or about August 17, 2018, annual business filing for CA STEAM Sonoma (C3884753) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (290): On or about August 17, 2018, annual business filing for CA STEAM Sonoma (C3884753) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (291): On or about August 31, 2018, Klarc Korver earned \$12,400.00 from Ca STEAM Sonoma. CA STEAM SANTA BARBARA:

OVERT ACT NO. (292): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM Santa Barbara for \$2,487,127.

OVERT ACT NO. (293): Between January 1, 2017 to February 11, 2019, CA STEAM Santa Barbara paid A3 Consulting \$516,761.

OVERT ACT NO. (294): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM Santa Barbara for \$1,718,786.31.

OVERT ACT NO. (295): Between January 1, 2017 to February 11, 2019, CA STEAM Santa Barbara paid A3 Education \$1,718,786.31.

OVERT ACT NO. (296): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA STEAM Santa Barbara for \$476,376.

CHARGES (cont'd)

OVERT ACT NO. (297): Between January 1, 2017 to February 11, 2019, CA STEAM Santa Barbara paid Global Consulting Services \$217,176.

OVERT ACT NO. (298): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA CA STEAM Santa Barbara for \$60,000.

OVERT ACT NO. (299): Between January 1, 2017 to February 11, 2019, CA STEAM Santa Barbara paid Mad Dog Marketing \$48,000.

OVERT ACT NO. (300): A management agreement exists between CA STEAM Santa Barbara and A3 Education allegedly signed on June 7, 2016 signed by Marc Veldhuizen, JASON SCHROCK's brother in law, on behalf of A3, and Rob Sikma on behalf of CA STEAM Santa Barbara.

OVERT ACT NO. (301): On or about July 1, 2016, ELI JOHNSON submitted a charter petition for CA STEAM Santa Barbara to the Cuyama Joint Unified School District and was granted authorization.

OVERT ACT NO. (302): On or about July 1, 2016, charter petition for CA STEAM Santa Barbara listed ELI JOHNSON as contact for the school to Cuyama Joint Unified School District.

OVERT ACT NO. (303): On or about July 1, 2016, charter petition for CA STEAM Santa Barbara listed C Ceriman, ROBERT WILLIAMS, Eric Johnson, Darrin Erb, Caroline Nuttall and JASON SCHROCK as the founding board members.

OVERT ACT NO. (304): On or about July 24, 2016, an EDCBO service agreement put in place with CA STEAM SANTA BARBARA for 3% of School revenue listed ELI JOHNSON as the school contact.

OVERT ACT NO. (305): On or about September 15, 2016 ELI JOHNSON submitted an application to the State of California for the Public Charter School Grant Program for Cal STEAM Santa Barbara certifying the charter school was not managed by a charter management organization.

OVERT ACT NO. (306): On or about 13, 2016, JASON SCHROCK registered CA STEAM Santa Barbara (C3953916) with the State of California as a non-profit corporation.

OVERT ACT NO. (307): On or about 13, 2016 JASON SCHROCK registered CA STEAM Santa Barbara (C3953916) using his personal address.

OVERT ACT NO. (308): On or about 20, 2016, SEAN MCMANUS opened California Credit Union bank account #7094****5 for CA STEAM Santa Barbara (C3953916).

OVERT ACT NO. (309): On or about 20, 2016, SEAN MCMANUS used 711 17th St, 8E, Costa Mesa, CA 92627 as the address c/o ACS Accountancy Corp 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 to open California Credit Union bank account #7094****5 for CA STEAM Santa Barbara which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

CHARGES (cont'd)

OVERT ACT NO. (310): On or about October 24, 2016, SEAN MCMANUS filed an addendum to California Credit Union bank account #7094****5 for CA STEAM Santa Barbara adding authorized signers.

OVERT ACT NO. (311): On or about October 24, 2016, California Credit Union bank account #7094****5 filing by SEAN MCMANUS added ROBERT WILLIAMS as authorized user for CA STEAM Santa Barbara bank account.

OVERT ACT NO. (312): On or about June 13, 2017, CA STEAM Santa Barbara (C3953915) submitted an annual filing as a non-profit listing ELI JOHNSON as the registered agent for the corporation.

OVERT ACT NO. (313): On or about June 13, 2017, CA STEAM Santa Barbara (C3953915) replaced JASON SCHROCK as registered agent with ELI JOHNSON.

OVERT ACT NO. (314): On or about June 13, 2017, despite changing agents CA STEAM Santa Barbara (C3953915) used the same address of 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 on its business filing which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (315): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (316): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (317): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with attendance accounting laws.

OVERT ACT NO. (318): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, listed Robert Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (319): On or about December 8, 2017, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2017, listed ELI JOHNSON as the Superintendent of the school.

OVERT ACT NO. (320): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (321): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018, and in the audit, reviewed compliance with funding determinations and attendance.

CHARGES (cont'd)

OVERT ACT NO. (322): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018, the annual audit for CA STEAM Santa Barbara and listed ELI JOHNSON as the administrator of the school.

OVERT ACT NO. (323): On or about December 12, 2018, Jeffery Hill submitted an annual audit for CA STEAM Santa Barbara dated June 30, 2018 and listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (324): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for CA STEAM Santa Barbara (C3953916).

OVERT ACT NO. (325): On or about August 17, 2018, annual business filing for CA STEAM Santa Barbara (C3953916) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (326): On or about August 17, 2018, annual business filing for CA STEAM Santa Barbara (C3953916) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

VALIANT ACADEMY SOUTHERN CALIFORNIA:

OVERT ACT NO. (327): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Prep Southern California for \$4,155,917.

OVERT ACT NO. (328): Between January 1, 2017 to February 11, 2019, Valiant Prep Southern California (which is controlled by SEAN MCMANUS and JASON SCHROCK) paid A3 Consulting \$4,155,917.

OVERT ACT NO. (329): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Prep Southern California for \$4,854,955.04.

OVERT ACT NO. (330): Between January 1, 2017 to February 11, 2019, Valiant Prep Southern California paid A3 Education \$4,854,955.04.

OVERT ACT NO. (331): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Prep Southern California for \$1,207,816.

OVERT ACT NO. (332): Between January 1, 2017 to February 11, 2019, Valiant Prep Southern California paid Global Consulting Services \$1,207,816.

OVERT ACT NO. (333): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Valiant Prep Southern California for \$360,000.

OVERT ACT NO. (334): Between January 1, 2017 to February 11, 2019, Valiant Prep Southern California paid Mad Dog Marketing \$360,000.

CHARGES (cont'd)

OVERT ACT NO. (335): In or around November 2016, JASON SCHROCK and SEAN MCMANUS, through the corporation Academics, Arts and Action Charter Academy (A3 Education), purchased from Foundation Learning LLC the rights to manage, operate, and collect public funds from Mosaica Online Academy of Southern California authorized by Dehesa Elementary School District.

OVERT ACT NO. (336): In or around November 2016, Steve Van Zant (owner of Ed Collective and EDCBO) brokered the deal between A3 Education and Foundation Learning LLC to purchase the rights to manage, operate, and collect public funds from Mosaica Online Academy of Southern California.

OVERT ACT NO. (337): In or around November 2016, Steve Van Zant (owner of Ed Collective and EDCBO) contracted to receive 3% of the purchase price (\$1.5 Million) for A3 Education's purchase of Mosaica Academy of Southern California from Foundation Learning LLC.

OVERT ACT NO. (338): On or about May 2, 2017, Education Collective (ED COLLECTIVE) a Steven Van Zant owned company, contracted with Jason Schrock and Valiant Academy Charter School- San Diego, to provide 'consulting' services for 3% of the school's annual state funding.

OVERT ACT NO. (339): In or around November 2016, JASON SCHROCK was listed as the President of A3 Foundation (CA) on the contract for purchase of the Mosaica Online Academy of Southern California.

OVERT ACT NO. (340): On or about December 5, 2016, JASON SCHROCK registered Online of Southern California (aka: Valiant Academy San Diego) with the State of California as a non-profit corporation (C3966287).

OVERT ACT NO. (341): On or about February 15, 2017, JASON SCHROCK filed and updated business filing for Online Academy of Southern California (C3966287) as a non-profit corporation within the State of California.

OVERT ACT NO. (342): On or about February 15, 2017, Mosaica Online Academy of Southern California (C3216022), and Online of Southern California (C3966287) filed its merger with the State of California signed by ROBERT WILLIAMS as a Board Member

OVERT ACT NO. (343): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (344): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (345): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with attendance accounting laws.

CHARGES (cont'd)

OVERT ACT NO. (346): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017 listed Robert Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (347): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017 listed JASON SCHROCK as the President of the school.

OVERT ACT NO. (348): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Southern California dated June 30, 2017 listed JUSTIN SCHMITT as the Director of the school.

OVERT ACT NO. (349): On or about September 8, 2017, JASON SCHROCK, as registered agent, submitted an updated business filing for Valiant Academy of San Diego (C3966287) with the name Valiant Academy of San Diego.

OVERT ACT NO. (350): On or about September 8, 2017, Valiant Academy of San Diego (C3966287) business filing listed JASON SCHROCK as the CFO.

OVERT ACT NO. (351): On or about September 8, 2017, Valiant Academy of San Diego (C3966287) business filing listed Robert Sikma as the CEO, and Klarc Korver as the SECRETARY.

OVERT ACT NO. (352): On or about September 8, 2017, Valiant Academy of San Diego (C3966287) business filing used 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the address, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (353): On or about September 25, 2017, JASON SCHROCK opened Farmers & Merchants bank account (270****7) 2017 for Valiant Academy of San Diego using the address-3300 Irvine Ave, Suite 330, Newport Beach, Ca 92660.

OVERT ACT NO. (354): On or about September 25, 2017, documents for Farmers & Merchants bank account (270****7) for Valiant Academy of San Diego documents listed JASON SCHROCK as an employee of A3 Education.

OVERT ACT NO. (355): On or about September 25, 2017, documents for Farmers & Merchants bank account (270****7) for Valiant Academy of San Diego documents listed ELI JOHNSON as the co-authorized user.

OVERT ACT NO. (356): On or about September 25, 2017, documents for Farmers & Merchants bank account (270****7) for Valiant Academy of San Diego documents listed ELI JOHNSON'S employer as California Prep.

OVERT ACT NO. (357): On or about September 25, 2017, Valiant Academy of San Diego approved a resolution authorizing opening Farmers & Merchants bank account (270****7) for Valiant Academy of San Diego and listed JASON SCHROCK as the officer and ELI JOHNSON as an authorized signer.

OVERT ACT NO. (358): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for Valiant Academy San Diego (C3966287) as the registered agent.

CHARGES (cont'd)

OVERT ACT NO. (359): On or about August 17, 2018, annual business filing for Valiant Academy San Diego (C3966287) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (360): On or about August 17, 2018, annual business filing for Valiant Academy San Diego (C3966287) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

VALIANT ACADEMY LOS ANGELES:

OVERT ACT NO. (361): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Academy Los Angeles for \$4,325,707.

OVERT ACT NO. (362): Between January 1, 2017 to February 11, 2019, Valiant Academy Los Angeles paid A3 Consulting \$2,834,915.

OVERT ACT NO. (363): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Academy Los Angeles for \$9,692,837.

OVERT ACT NO. (364): Between January 1, 2017 to February 11, 2019, Valiant Academy Los Angeles paid A3 Education \$8,960,212.94.

OVERT ACT NO. (365): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Academy Los Angeles for \$1,038,880.

OVERT ACT NO. (366): Between January 1, 2017 to February 11, 2019, Valiant Academy Los Angeles paid Global Consulting Services \$1,038,880.

OVERT ACT NO. (367): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Valiant Academy Los Angeles for \$315,000.

OVERT ACT NO. (368): Between January 1, 2017 to February 11, 2019, Valiant Academy Los Angeles paid Mad Dog Marketing \$315,000.

OVERT ACT NO. (369): On or about October 27, 2016 JASON SCHROCK was listed as COO of Valiant Academy Los Angeles in an agreement with Ed Collective, LLC for services.

OVERT ACT NO. (370): In or around November 2016, JASON SCHROCK and SEAN MCMANUS, through the corporation Academics, Arts and Action Charter Academy, purchased from Foundation Learning LLC the rights to manage, operate, and collect public funds from Mosaica Online Academy of Los Angeles authorized by Acton Agua Dulce Unified School District.

CHARGES (cont'd)

OVERT ACT NO. (371): In or around November 2016, Steve Van Zant (owner of Ed Collective and EDCBO) brokered the deal between A3 Education and Foundation Learning LLC to purchase the rights to manage, operate, and collect public funds from Mosaica Online Academy of Los Angeles.

OVERT ACT NO. (372): In or around November 2016, Steve Van Zant (owner of Ed Collective and EDCBO) contracted to receive 3% of the purchase price (\$1.5 Million) for A3 Education's purchase of Mosaica Academy of Los Angeles from Foundation Learning LLC.

OVERT ACT NO. (373): On or about May 2, 2017, Education Collective (ED COLLECTIVE) a Steven Van Zant owned company, contracted with Jason Schrock and Valiant Academy Charter School, to provide 'consulting' services for 3% of the school's annual state funding

OVERT ACT NO. (374): In or around November 2016, JASON SCHROCK was listed as the President of A3 Foundation (CA) on the contract for purchase of the Mosaica Online Academy of Los Angeles.

OVERT ACT NO. (375): On or about December 5, 2016, JASON SCHROCK registered Online Academy of Los Angeles (aka: Valiant Academy of Los Angeles) with the State of California as a non-profit corporation (C3966286).

OVERT ACT NO. (376): On or about February 15, 2017, JASON SCHROCK submitted a business filing for Online Academy of Los Angeles (C3966286) as a non-profit corporation within the State of California.

OVERT ACT NO. (377): On or about February 15, 2017, Mosaica Online Academy of Los Angeles (C3694447), and Online Academy of Los Angeles (C3966286) filed its merger with the State of California signed by ROBERT WILLIAMS as a Board Member.

OVERT ACT NO. (378): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 based on information provided to him by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (379): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (380): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with attendance accounting laws.

OVERT ACT NO. (381): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 and listed Robert Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (382): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 and listed JASON SCHROCK as the President of the school.

CHARGES (cont'd)

OVERT ACT NO. (383): On or about January 26, 2018, Jeffery Hill submitted an annual audit for Valiant Academy of Los Angeles dated June 30, 2017 and listed JUSTIN SCHMITT as the Director of the school.

OVERT ACT NO. (384): On or about July 24, 2017, to June 8, 2018, Global Consulting Services contracted with Valiant Academy of Los Angeles resulting in invoices totaling \$1,038,880.

OVERT ACT NO. (385): On or about August 2, 2017, Online Academy of Los Angeles (C3966286) changed its name to Valiant Academy LA.

OVERT ACT NO. (386): On or about August 10, 2017, Online Academy of Los Angeles filed a name change with the State of California to become Valiant Academy of LA.

OVERT ACT NO. (387): On or about August 10, 2017, articles of incorporation showing name change from Online Academy of Los Angeles to Valiant Academy of LA indicate Robert Sikma and Klarc Korver were board members.

OVERT ACT NO. (388): On or about August 21, 2017, JASON SCHROCK opened Farmers & Merchants bank account (270****2) for Online Academy of Los Angeles.

OVERT ACT NO. (389): On or about August 21, 2017, JASON SCHROCK listed his employer as A3 Education on documents to open Farmers & Merchants bank account (270****2) for Online Academy of Los Angeles.

OVERT ACT NO. (390): On or about August 21, 2017, ELI JOHNSON was listed as the co-authorized user on Farmers & Merchants bank account (270****2) for Online Academy of Los Angeles.

OVERT ACT NO. (391): On or about August 21, 2017, Online Academy of Los Angeles Board approved a resolution authorizing opening a Farmers & Merchants bank account (270****2) for Online Academy of Los Angeles and listed JASON SCHROCK as the President/CEO.

OVERT ACT NO. (392): On or about August 21, 2017, Online Academy of Los Angeles Board approved a resolution authorizing opening a Farmers & Merchants bank account (270****2) for Online Academy of Los Angeles and listed ELI JOHNSON as an authorized signer for both Online Academy of Los Angeles and for the account.

OVERT ACT NO. (393): On or about August 21, 2017, a power of attorney declaration was filed with South Carolina Dept. of Revenue on behalf of Online Academy of Los Angeles which identified JASON SCHROCK as the president of Online Academy of Los Angeles.

OVERT ACT NO. (394): On or about September 8, 2017, Valiant Academy of LA (C3966286) submitted an annual business filing with the name Valiant Academy of LA.

OVERT ACT NO. (395): On or about September 8, 2017, Valiant Academy of LA (C3966286) business filing listed JASON SCHROCK as the CFO.

CHARGES (cont'd)

OVERT ACT NO. (396): On or about September 8, 2017, Valiant Academy of LA (C3966286) business filing listed Robert Sikma as the CEO, Klarc Korver as the SECRETARY.

OVERT ACT NO. (397): On or about September 8, 2017, Valiant Academy of LA (C3966286) business filing used 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (398): On or about and between September 30, 2017, - December 19, 2018, Mad Dog Marketing contracted with Valiant Academy of Los Angeles resulting in invoices of \$315,000.

OVERT ACT NO. (399): On or about and between September 30, 2017, - February 8, 2019, A3 Consulting contracted with Valiant Academy of Los Angeles resulting in invoices totaling \$4,325,707.

OVERT ACT NO. (400): On or about October 19, 2017, JASON SCHROCK changed the name of Farmers & Merchants bank account (270****2) from Online Academy of Los Angeles to Valiant Academy of Los Angeles.

OVERT ACT NO. (401): On or about October 19, 2017, JASON SCHROCK listed his employer as A3 Education on Farmers & Merchants bank account (270****2) for Valiant Academy Los Angeles.

OVERT ACT NO. (402): On or about October 19, 2017, bank documents show Farmers & Merchants bank account (270****2) for Valiant Academy Los Angeles continued to use the address-3300 Irvine Ave, Suite 330, Newport Beach, Ca 92660.

OVERT ACT NO. (403): On or about October 19, 2017, bank documents show ELI JOHNSON was the co-authorized user of Farmers & Merchants bank account (270****2) for Valiant Academy Los Angeles.

OVERT ACT NO. (404): On or about October 19, 2017, bank documents indicate ELI JOHNSON's employer was California Prep.

OVERT ACT NO. (405): On or about October 19, 2017, the Valiant Academy of Los Angeles Board approved a resolution related to Farmers & Merchants bank account (270****2) listing JASON SCHROCK as the officer of the corporation.

OVERT ACT NO. (406): On or about October 19, 2017, the Valiant Academy of Los Angeles Board approved a resolution related to Farmers & Merchants bank account (270****2) listing ELI JOHNSON as an authorized signer.

OVERT ACT NO. (407): On or about October 19, 2017, documents for Farmers & Merchants bank account (270****2) for Valiant Preparatory Academy LA list Robert Sikma as the CEO and Klarc Korver as the Secretary for Valiant Academy Los Angeles.

OVERT ACT NO. (408): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for Valiant Academy LA (C3966286).

CHARGES (cont'd)

OVERT ACT NO. (409): On or about August 17, 2018, annual business filing for Valiant Academy LA (C3966286) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (410): On or about August 17, 2018, annual business filing for Valiant Academy LA (C3966286) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

VALIANT ACADEMY SANTA BARBARA:

OVERT ACT NO. (411): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Santa Barbara for \$1,972,427.

OVERT ACT NO. (412): Between January 1, 2017 to February 11, 2019, Valiant Santa Barbara paid A3 Consulting \$530,083.

OVERT ACT NO. (413): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Santa Barbara for \$472,769.

OVERT ACT NO. (414): Between January 1, 2017 to February 11, 2019, Valiant Santa Barbara paid A3 Education \$472,769.

OVERT ACT NO. (415): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Valiant Santa Barbara for \$79,950.

OVERT ACT NO. (416): Between January 1, 2017 to February 11, 2019, Valiant Santa Barbara paid Global Consulting Services \$79,950.

OVERT ACT NO. (417): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Valiant Santa Barbara for \$45,000.

OVERT ACT NO. (418): Between January 1, 2017 to February 11, 2019, Valiant Santa Barbara paid Mad Dog Marketing \$45,000.

OVERT ACT NO. (419): On or about July 1, 2017, ELI JOHNSON submitted a charter petition to and was granted authorization for Valiant Santa Barbara by Cuyama Joint Unified School District.

OVERT ACT NO. (420): On or about July 1, 2017, charter petition for Valiant Santa Barbara listed ELI JOHNSON as lead petitioner and contact for the school with Cuyama Joint Unified School District.

OVERT ACT NO. (421): On or about October 27, 2017, JASON SCHROCK and ELI JOHNSON opened Farmers & Merchants bank account (270****1) for Valiant Academy Santa Barbara.

CHARGES (cont'd)

OVERT ACT NO. (422): On or about October 27, 2017, bank documents for Farmers & Merchants bank account (270****1) for Valiant Academy Santa Barbara listed 3300 Irvine Ave, Suite 330, Newport Beach, Ca 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (423): On or about October 27, 2017, JASON SCHROCK listed A3 Education as his employer on Farmers & Merchants bank account (270****1) for Valiant Academy Santa Barbara.

OVERT ACT NO. (424): On or about October 27, 2017, bank documents for Farmers & Merchants bank account (270****1) for Valiant Academy Santa Barbara listed ELI JOHNSON's employer as California Prep.

OVERT ACT NO. (425): On or about October 27, 2017, the Valiant Academy LA board approved a resolution authorizing opening Farmers & Merchants bank account's (270****1) for Valiant Academy Santa Barbara, which listed JASON SCHROCK as an Officer of the Corporation.

OVERT ACT NO. (426): On or about October 27, 2017, the Valiant Academy LA board approved a resolution authorizing opening Farmers & Merchants bank account's (270****1) for Valiant Academy Santa Barbara, which listed ELI JOHNSON as an authorized signer on the account.

OVERT ACT NO. (427): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (428): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018 and in the audit, reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (429): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018 and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (430): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Valiant Santa Barbara dated June 30, 2018, the annual audit for Valiant Santa Barbara listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

UPLIFT CALIFORNIA (MONTEREY):

OVERT ACT NO. (431): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift California for \$2,216,054.

OVERT ACT NO. (432): Between January 1, 2017 to February 11, 2019, Uplift California paid A3 Consulting \$2,216,054.

OVERT ACT NO. (433): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift California for \$2,568,029.03.

CHARGES (cont'd)

OVERT ACT NO. (434): Between January 1, 2017 to February 11, 2019, Uplift California paid A3 Education \$2,073,029.03.

OVERT ACT NO. (435): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift California for \$286,290.

OVERT ACT NO. (436): Between January 1, 2017 to February 11, 2019, Uplift California paid Global Consulting Services \$286,290.

OVERT ACT NO. (437): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Uplift California for \$120,000.

OVERT ACT NO. (438): Between January 1, 2017 to February 11, 2019, Uplift California paid Mad Dog Marketing \$120,000.

OVERT ACT NO. (439): A management agreement exists between Uplift California (Monterey) and A3 Education allegedly signed on June 7, 2016 by Rob Sikma on behalf of Uplift California (Monterey)

OVERT ACT NO. (440): On or about July 24, 2016, an EDCBO service agreement put in place with CA STEAM Charter School Monterey County lists ELI JOHNSON as the School contact.

OVERT ACT NO. (441): On or about July 25, 2016, SEAN MCMANUS directed Luis Rigney to fill out paperwork to register UPLIFT California Charter Schools (C3930004) as a non-profit corporation in the State of California and claim he is the chief officer of Uplift California Charter Schools.

OVERT ACT NO. (442): On or about August 23, 2016, at the direction of SEAN MCMANUS, Luis Rigney submitted a charter petition to and was granted authorization for UPLIFT California Monterey Charter School by Bradley Union School.

OVERT ACT NO. (443): On or about August 23, 2016, charter petition for UPLIFT Monterey Charter School listed C Ceriman, Robert Williams, Eric Johnson, Darrin Erb, Caroline Nuttall and JASON SCHROCK as board members for the charter.

OVERT ACT NO. (444): On or about July 24, 2016, an EDCBO service agreement put in place with CA STEAM Charter School Monterey County lists ELI JOHNSON as the School contact.

OVERT ACT NO. (445): On or about February 14, 2017, SEAN MCMANUS filed a registration form for Commercial Employers with CA Employment Development Department on behalf of Uplift California Charter Schools listing himself as the CEO.

OVERT ACT NO. (446): On or about February 14, 2017, SEAN MCMANUS filed a registration form for Commercial Employers with CA Employment Development Department on behalf of Uplift California Charter Schools listing JASON SCHROCK's address as the Physical location of the charter.

CHARGES (cont'd)

OVERT ACT NO. (447): On or about March 8, 2017, ROBERT WILLIAMS filed an annual business filing for UPLIFT CA Charter Schools (C3930004).

OVERT ACT NO. (448): On or about March 8, 2017, business filing for UPLIFT CA Charter Schools (C3930004) lists ELI JOHNSON as the CEO/SECRETARY/CFO.

OVERT ACT NO. (449): On or about March 8, 2017, business filing for UPLIFT CA Charter Schools (C3930004) lists address of the charter school at 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660.

OVERT ACT NO. (450): On or about and between May 2, 2017, – May 4, 2018, A3 Education contracted with Uplift Monterey resulting in invoices totaling \$2,568,029.

OVERT ACT NO. (451): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (452): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with spending requirements according to its funding determination.

OVERT ACT NO. (453): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017, and in the audit, reviewed and confirmed the school complied with attendance accounting laws.

OVERT ACT NO. (454): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017, and listed Robert Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (455): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017 and listed ELI JOHNSON as the Superintendent of the school.

OVERT ACT NO. (456): On or about December 5, 2017 Jeffery Hill submitted an annual audit for Uplift Monterey dated June 30, 2017 and listed Luis Rigney as the Principal of the school.

OVERT ACT NO. (457): On or about September 26, 2017, SEAN MCMANUS signed contract between EDCBO and UPLIFT SCHOOLS- Monterey County (UPLIFT North, UPLIFT South, UPLIFT Monterey) on behalf of UPLIFT Schools.

OVERT ACT NO. (458): On or about September 26, 2017, EDCBO signed a service contract with UPLIFT SCHOOLS- Monterey County (UPLIFT North, UPLIFT South, UPLIFT Monterey) listed ELI JOHNSON as the School contact.

OVERT ACT NO. (459): On or about October 26, 2017, SEAN MCMANUS and ELI JOHNSON opened Farmers & Merchants bank account (270****5) for California STEAM San Bernardino/ Uplift California.

CHARGES (cont'd)

OVERT ACT NO. (460): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****5) for California STEAM San Bernardino/ Uplift California used the address-711 17th St, Unit 8E, Costa Mesa, CA 92627 to open.

OVERT ACT NO. (461): On or about October 26, 2017, SEAN MCMANUS listed his employer as California Prep in documents related to Farmers & Merchants bank account (270****5) for California STEAM San Bernardino/ Uplift California.

OVERT ACT NO. (462): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****5) for California STEAM San Bernardino/ Uplift California indicate ELI JOHNSON is a co-authorized user for the account.

OVERT ACT NO. (463): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****5) for California STEAM San Bernardino/ Uplift California indicate ELI JOHNSON is employed by California Prep.

OVERT ACT NO. (464): On or about October 26, 2017, The California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****5), and listed SEAN MCMANUS as the CEO/Secretary for the non-profit.

OVERT ACT NO. (465): On or about October 26, 2017, The California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****5), and listed ELI JOHNSON as an authorized signer the account.

OVERT ACT NO. (466): On or about August 17, 2018, ROBERT WILLIAMS submitted an annual business filing for UPLIFT California Charter Schools (C393004).

OVERT ACT NO. (467): On or about August 17, 2018, annual business filing for UPLIFT California Charter Schools (C393004) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO.

OVERT ACT NO. (468): On or about August 17, 2018, annual business filing for UPLIFT California Charter Schools (C393004) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.
UPLIFT NORTH:

OVERT ACT NO. (469): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift North for \$2,144,560.

OVERT ACT NO. (470): Between January 1, 2017 to February 11, 2019, Uplift North paid A3 Consulting \$398,210.

OVERT ACT NO. (471): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift North for \$85,604.

CHARGES (cont'd)

OVERT ACT NO. (472): Between January 1, 2017 to February 11, 2019, Uplift North paid A3 Education \$85,604.

OVERT ACT NO. (473): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift North for \$325,832.

OVERT ACT NO. (474): Between January 1, 2017 to February 11, 2019, Uplift North paid Global Consulting Services \$66,632.

OVERT ACT NO. (475): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Uplift North for \$45,000.

OVERT ACT NO. (476): Between January 1, 2017 to February 11, 2019, Uplift North paid Mad Dog Marketing \$45,000.

OVERT ACT NO. (477): On or about July 1, 2017, at the direction of SEAN MCMANUS, Luiz Rigney submitted a charter petition to and was granted authorization for Uplift Ca North by the Bradley Elementary School District.

OVERT ACT NO. (478): On or about July 1, 2017, charter petition for Uplift CA North listed Luiz Rigney as lead petitioner and contact for the school to Bradley Elementary School District.

OVERT ACT NO. (479): On or about July 1, 2017, charter petition for Uplift CA North listed C Ceriman, ROBERT WILLIAMS, Eric Johnson, Darrin Erb, Caroline Nuttall and JASON SCHROCK as the founding board members.

OVERT ACT NO. (480): On or about October 26, 2017, SEAN MCMANUS and ELI JOHNSON opened Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH.

OVERT ACT NO. (481): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH identifies the address associated with the account as 711 17th St, Unit 8E, Costa Mesa, CA 92627.

OVERT ACT NO. (482): On or about October 26, 2017, SEAN MCMANUS identified his employer as California Prep in bank documents for Farmers & Merchants bank account (270****9).

OVERT ACT NO. (483): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH showed ELI JOHNSON as the co-authorized signor and listed his employer as California Prep.

OVERT ACT NO. (484): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH showed ELI JOHNSON's employer as California Prep.

CHARGES (cont'd)

OVERT ACT NO. (485): On or about October 26, 2017, The California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH and listed SEAN MCMANUS as the CEO/Secretary for the non-profit and the account.

OVERT ACT NO. (486): On or about October 26, 2017, The California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****9) for California STEAM San Bernardino/ Uplift NORTH and listed ELI JOHNSON as an authorized signer the account.

OVERT ACT NO. (487): On or about October 26, 2017, JASON SCHROCK was listed on the IRS documentation (FORM 990) for UPLIFT NORTH.

OVERT ACT NO. (488): On or about October 27, 2017, UPLIFT North (C4079377) was registered in the State of California as a non-profit.

OVERT ACT NO. (489): On or about October 27, 2017, UPLIFT North (C4079377) business filing uses address 3300 Irvine Ave, Suite 330, Newport Beach, CA 92620 as its corporation address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (490): On or about February 27, 2018, UPLIFT North (C4079377) annual business filing lists Rob Sikma as the CEO and Klarc Korver as the Secretary.

OVERT ACT NO. (491): On or about February 27, 2018, UPLIFT North (C4079377) annual business filing lists ROBERT WILLIAMS as the CFO.

UPLIFT SOUTH:

OVERT ACT NO. (492): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift South for \$1,917,942.

OVERT ACT NO. (493): Between January 1, 2017 to February 11, 2019, Uplift South paid A3 Consulting \$1,459,706.

OVERT ACT NO. (494): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift South for \$139,398.

OVERT ACT NO. (495): Between January 1, 2017 to February 11, 2019, Uplift South paid A3 Education \$139,398.

OVERT ACT NO. (496): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift South for \$367,704.

OVERT ACT NO. (497): Between January 1, 2017 to February 11, 2019, Uplift South paid Global Consulting Services \$108,504.

CHARGES (cont'd)

OVERT ACT NO. (498): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Uplift South for \$45,000.

OVERT ACT NO. (499): Between January 1, 2017 to February 11, 2019, Uplift South paid Mad Dog Marketing \$45,000.

OVERT ACT NO. (500): On or about July 1, 2017, at the direction of SEAN MCMANUS, Luis Rigney submitted a charter petition to and was granted authorization for Uplift Ca South by the Bradley Elementary School District.

OVERT ACT NO. (501): On or about July 1, 2017, charter petition for Uplift CA South listed Luis Rigney as lead petitioner and contact for the school to Bradley Elementary School District.

OVERT ACT NO. (502): On or about July 1, 2017, charter petition for Uplift CA South listed C Ceriman, ROBERT WILLIAMS, Eric Johnson, Darrin Erb, Caroline Nuttall and JASON SCHROCK as the founding board members.

OVERT ACT NO. (503): On or about October 26, 2017, SEAN MCMANUS and ELI JOHNSON opened Farmers & Merchants bank account (270****7) for California STEAM San Bernardino/ Uplift SOUTH Account.

OVERT ACT NO. (504): On or about October 26, 2017, SEAN MCMANUS identified his employer as California Prep in bank documents for Farmers & Merchants bank account (270****7) for California STEAM San Bernardino/ Uplift SOUTH.

OVERT ACT NO. (505): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****7) for California STEAM San Bernardino/ Uplift SOUTH listed ELI JOHNSON's employer as California Prep.

OVERT ACT NO. (506): On or about October 26, 2017, the California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****7) for California STEAM San Bernardino/ Uplift SOUTH which listed SEAN MCMANUS as the CEO/Secretary for the non-profit.

OVERT ACT NO. (507): On or about October 26, 2017, the California STEAM San Bernardino Board approved a resolution authorizing opening Farmers & Merchants bank account (270****7) for California STEAM San Bernardino/ Uplift SOUTH which listed ELI JOHNSON as an authorized signer on the account.

OVERT ACT NO. (508): On or about October 27, 2017, UPLIFT South (C4079376) was registered in the State of California as a non-profit.

OVERT ACT NO. (509): On or about October 27, 2017, UPLIFT South (C4079376) business filing uses address 3300 Irvine Ave, Suite 330, Newport Beach, CA 92620 as its corporation address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (510): On or about February 27, 2018, UPLIFT SOUTH (C4079376) submitted an updated business filing.

CHARGES (cont'd)

OVERT ACT NO. (511): On or about February 27, 2018, UPLIFT SOUTH (C4079376) business filing lists Rob Sikma as the CEO and Klarc Korver as the Secretary.

OVERT ACT NO. (512): On or about February 27, 2018, UPLIFT SOUTH (C4079376) business filing lists ROBERT WILLIAMS as the CFO.

OVERT ACT NO. (513): On or about February 27, 2018, UPLIFT SOUTH (C4079376) annual business filing lists 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.
UPLIFT SANTA BARBARA:

OVERT ACT NO. (514): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift Santa Barbara for \$3,408,022.

OVERT ACT NO. (515): Between January 1, 2017 to February 11, 2019, Uplift Santa Barbara paid A3 Consulting \$1,825,372.

OVERT ACT NO. (516): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift Santa Barbara for \$38,358.

OVERT ACT NO. (517): Between January 1, 2017 to February 11, 2019, Uplift Santa Barbara paid A3 Education \$38,358.

OVERT ACT NO. (518): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced Uplift Santa Barbara for \$482,360.

OVERT ACT NO. (519): Between January 1, 2017 to February 11, 2019, Uplift Santa Barbara paid Global Consulting Services \$223,160.

OVERT ACT NO. (520): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA Uplift Santa Barbara for \$60,000.

OVERT ACT NO. (521): Between January 1, 2017 to February 11, 2019, Uplift Santa Barbara paid Mad Dog Marketing \$60,000.

OVERT ACT NO. (522): In or around and between January and July 2017, ELI JOHNSON

OVERT ACT NO. (523): On or about October 26, 2017, SEAN MCMANUS and ELI JOHNSON opened Farmers & Merchants bank account (270****3) for California STEAM San Bernardino/ Uplift Santa Barbara.

CHARGES (cont'd)

OVERT ACT NO. (524): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****3) for California STEAM San Bernardino/ Uplift Santa Barbara used the address-711 17th St, Unit 8E, Costa Mesa, CA 92627.

OVERT ACT NO. (525): On or about October 26, 2017, SEAN MCMANUS identified his employer as California Prep in bank documents for Farmers & Merchants bank account (270****3) for California STEAM San Bernardino/ Uplift Santa Barbara.

OVERT ACT NO. (526): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****3) for California STEAM San Bernardino/ Uplift Santa Barbara showed ELI JOHNSON as the co-authorized user.

OVERT ACT NO. (527): On or about October 26, 2017, bank documents for Farmers & Merchants bank account (270****3) for California STEAM San Bernardino/ Uplift Santa Barbara showed ELI JOHNSON's employer as California Prep.

OVERT ACT NO. (528): On or about October 27, 2017, UPLIFT California Santa Barbara (C4079227) was registered in the State of California as a non-profit.

OVERT ACT NO. (529): On or about October 27, 2017, UPLIFT California Santa Barbara (C4079227) business filing used 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as a corporate address, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS. .

OVERT ACT NO. (530): On or about February 27, 2018, UPLIFT CA Santa Barbara (C4079227) submitted an annual filing for non-profits.

OVERT ACT NO. (531): On or about February 27, 2018, UPLIFT CA Santa Barbara (C4079227) annual filing identified Rob Sikma as the CEO and Klarc Korver as the Secretary.

OVERT ACT NO. (532): On or about February 27, 2018, UPLIFT CA Santa Barbara (C4079227) annual filing identified ROBERT WILLIAMS as the CFO.

OVERT ACT NO. (533): On or about February 27, 2018, UPLIFT CA Santa Barbara (C4079227) annual filing identified 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as the corporate address, which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (534): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (535): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018 and in the audit, reviewed compliance with funding determinations and attendance.

CHARGES (cont'd)

OVERT ACT NO. (536): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018 and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (537): On or about December 17, 2018, Jeffery Hill submitted an annual audit for Uplift Santa Barbara dated June 30, 2018 and listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

CALIFORNIA ACADEMY OF SPORTS SCIENCE:

OVERT ACT NO. (538): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced California Academy of Sports Science for \$2,370,179.

OVERT ACT NO. (539): Between January 1, 2017 to February 11, 2019, California Academy of Sports Science paid A3 Consulting \$1,530,179.

OVERT ACT NO. (540): Between January 1, 2017 to February 11, 2019, A3 Education (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced California Academy of Sports Science for \$438,621.

OVERT ACT NO. (541): Between January 1, 2017 to February 11, 2019, California Academy of Sports Science paid A3 Education \$438,621.

OVERT ACT NO. (542): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced California Academy of Sports Science for \$169,216.

OVERT ACT NO. (543): Between January 1, 2017 to February 11, 2019, California Academy of Sports Science paid Global Consulting Services \$169,216.

OVERT ACT NO. (544): Between January 1, 2017 to February 11, 2019, Mad Dog Marketing (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced CA California Academy of Sports Science for \$90,000.

OVERT ACT NO. (545): Between January 1, 2017 to February 11, 2019, California Academy of Sports Science paid Mad Dog Marketing \$90,000.

OVERT ACT NO. (546): On or about August 10, 2017, JUSTIN SCHMITT submitted a charter petition to and was granted authorization for California Academy of Sports Science by the Dehesa Elementary School District.

OVERT ACT NO. (547): On or about August 10, 2017, JUSTIN SCHMITT claimed to Dehesa Elementary School District that California Academy of Sports Science was a stand-alone school.

OVERT ACT NO. (548): On or about August 10, 2017, charter petition for California Academy of Sports Science, listed Rob Sikma, Raymond Uzeta, Klarc Korver, ROBERT WILLIAMS and Eric Johnson as founding Board members.

CHARGES (cont'd)

OVERT ACT NO. (549): On or about August 10, 2017, charter petition for California Academy of Sports Science included Articles of Incorporation from 'Online of Southern California' C3966287 listing JASON SCHROCK as the registered agent.

OVERT ACT NO. (550): On or about September 26, 2017, SEAN MCMANUS signed the agreement between EDCBO Group and California Academy of Sports Science on behalf of California Academy of Sports Science.

OVERT ACT NO. (551): On or about October 27, 2017, JASON SCHROCK and ELI JOHNSON opened Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego.

OVERT ACT NO. (552): On or about October 27, 2017, bank documents for Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego used 3300 Irvine Ave, Suite 330, Newport Beach, Ca 92660 as the address for the corporation which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (553): On or about October 27, 2017, JASON SCHROCK listed his employer as A3 Education on Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego.

OVERT ACT NO. (554): On or about October 27, 2017, bank documents for Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego lists ELI JOHNSON's employer as California Prep.

OVERT ACT NO. (555): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego and listed Robert Sikma as the CEO of the corporation.

OVERT ACT NO. (556): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego and listed JASON SCHROCK as an authorized signer on the account.

OVERT ACT NO. (557): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants Bank account (270****5) for Valiant Academy LA- Valiant Sports Science San Diego and listed ELI JOHNSON as an authorized signer on the account.

OVERT ACT NO. (558): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (559): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018, and in the audit, reviewed compliance with funding determinations and attendance.

CHARGES (cont'd)

OVERT ACT NO. (560): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018 and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (561): On or about December 14, 2018 Jeffery Hill submitted an annual audit for California Academy of Sports Science dated June 30, 2018 and listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (562): On or about August 30, 2018 Kevin Tu wrote a letter authorizing ROBERT WILLIAMS to consent to opening up a corporation for California Academy of Sports Science San Diego.

OVERT ACT NO. (563): On or about September 21, 2018, ROBERT WILLIAMS registered California Academy of Sports Science Southern California (CASS San Diego) (C4197221) with the State of California as a non-profit.

OVERT ACT NO. (564): On or about September 20, 2018, annual business filing for California Academy of Sports Science Southern California (CASS San Diego) (C4197221) used 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as its corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (565): On or about November 7, 2018, Viku Mehta submitted an updated business filing for California Academy of Sports Science Southern California (CASS San Diego) (C4197221).

OVERT ACT NO. (566): On or about November 7, 2018, updated business filing for California Academy of Sports Science Southern California (CASS San Diego) (C4197221) listed Rob Sikma as the CEO, Klarc Korver as the Secretary, and Kevin Tu as the CFO and registered agent.

OVERT ACT NO. (567): On or about November 7, 2018, updated business filing for California Academy of Sports Science Southern California (CASS San Diego) (C4197221) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as its corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

CALIFORNIA ACADEMY OF SPORTS SCIENCE FRESNO:

OVERT ACT NO. (568): On or around and between July 2017-January 2018, at the direction of JASON SCHROCK, Fernando Napoles petitioned for and obtained authorization for the California Academy of Sports Science Fresno from the Raisin City Elementary School District.

OVERT ACT NO. (569): On or about October 27, 2017, JASON SCHROCK and ELI JOHNSON opened Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno.

OVERT ACT NO. (570): On or about October 27, 2017, bank documents for Farmers & Merchants account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno used 3300 Irvine Ave, Suite 330, Newport Beach, Ca 92660 which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

CHARGES (cont'd)

OVERT ACT NO. (571): On or about October 27, 2017, JASON SCHROCK listed his employer as A3 Education on Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno.

OVERT ACT NO. (572): On or about October 27, 2017, bank documents for Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno list ELI JOHNSON's employer as California Prep.

OVERT ACT NO. (573): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno and listed Robert Sikma as CEO and Klarc Korver as SECRETARY for the corporation.

OVERT ACT NO. (574): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno and listed JASON SCHROCK as an Officer.

OVERT ACT NO. (575): On or about October 27, 2017, the Valiant Academy LA Board passed a board resolution authorizing opening Farmers & Merchants bank account (270****3) for Valiant Academy LA -Valiant Sports Science Fresno and listed ELI JOHNSON as an authorized signer on the account.

OVERT ACT NO. (576): On or about November 16, 2017, California Academy of Sports Science Fresno-CASS Fresno (C4084189) was registered with the State of California as a non-profit by Kevin Tu.

OVERT ACT NO. (577): On or about November 16, 2017, California Academy of Sports Science Fresno-CASS Fresno (C4084189) business filing lists 3300 Irvine Ave, Suite 330, Newport Beach, CA 92620 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (578): On or about December 28, 2017, SEAN MCMANUS opened Farmers & Merchants bank account (270***0) for CA STEAM San Bernardino- California Academy of Sports Science Fresno.

OVERT ACT NO. (579): On or about December 28, 2017, SEAN MCMANUS listed his employer as California Prep on documentation for Farmers & Merchants bank account (270***0) for CA STEAM San Bernardino- California Academy of Sports Science Fresno.

OVERT ACT NO. (580): On or about December 28, 2017, bank documents for Farmers & Merchants bank account (270***0) for CA STEAM San Bernardino- California Academy of Sports Science Fresno listed ELI JOHNSON as the co-authorized user of the account.

OVERT ACT NO. (581): On or about December 28, 2017, bank documents for Farmers & Merchants bank account (270***0) for CA STEAM San Bernardino- California Academy of Sports Science Fresno listed ELI JOHNSON as an employee of California Prep.

CHARGES (cont'd)

OVERT ACT NO. (582): On or about December 28, 2017, the California STEAM San Bernardino Board approved a board resolution authorizing opening Farmers & Merchants bank account (270***0) CA STEAM San Bernardino-California Academy of Sports Science Fresno, which listed SEAN MCMANUS as the CEO/Secretary for the non-profit.

OVERT ACT NO. (583): On or about December 28, 2017, the California STEAM San Bernardino Board approved a board resolution authorizing opening Farmers & Merchants bank account (270***0) CA STEAM San Bernardino-California Academy of Sports Science Fresno, which listed ELI JOHNSON as an authorized signer for the account.

OVERT ACT NO. (584): On or about May 4, 2018, Viku Mehta submitted an annual business filing for California Academy of Sports Science Fresno- CASS Fresno (C4084189).

OVERT ACT NO. (585): On or about May 4, 2018, California Academy of Sports Science Fresno- CASS Fresno (C4084189) annual business filing listed Kevin Tu CEO of the corporation and registered agent.

OVERT ACT NO. (586): On or about May 4, 2018, California Academy of Sports Science Fresno- CASS Fresno (C4084189) annual business filing listed Jessica Bulk as a Board Member of the corporation yet Jessica Bulk never attending any Board meetings.

OVERT ACT NO. (587): On or about May 4, 2018, California Academy of Sports Science Fresno- CASS Fresno (C4084189) annual business filing listed Lambert Sikkema as CFO of the corporation yet Lambert Sikkema was unaware of his position as CFO of the corporation.

OVERT ACT NO. (588): On or about December 14, 2018 Jeffrey Hill submitted and annual audit for California Academy of Sports Science Fresno dated June 30, 2018, based on information provided by SEAN MCMANUS, JASON SCHROCK and/or their subordinates.

OVERT ACT NO. (589): On or about December 14, 2018 Jeffrey Hill submitted and annual audit for California Academy of Sports Science Fresno dated June 30, 2018 and in the audit, reviewed compliance with funding determinations and attendance.

OVERT ACT NO. (590): On or about December 14, 2018 Jeffrey Hill submitted and annual audit for California Academy of Sports Science Fresno dated June 30, 2018 and listed ELI JOHNSON as the administrator.

OVERT ACT NO. (591): On or about December 14, 2018 Jeffrey Hill submitted and annual audit for California Academy of Sports Science Fresno dated June 30, 2018 and listed Rob Sikma, Klarc Korver, Kevin Tu and Eric Johnson as board members.

OVERT ACT NO. (592): On or around July 30, 2018, JASON SCHROCK told Jessica Bulk she was part of the founding team but was not a Board member of California Academy of Sports Science.

OVERT ACT NO. (593): On or around July 30, 2018, JASON SCHROCK sent Jessica Bulk documents for her wet signature so he could open a bank account for California Academy of Sports Science Fresno.

CHARGES (cont'd)

UNIVERSITY PREP:

OVERT ACT NO. (594): Between January 1, 2017 to February 11, 2019, A3 Consulting (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced University Prep for \$6,194,809.48.

OVERT ACT NO. (595): Between January 1, 2017 to February 11, 2019, University Prep paid A3 Consulting \$4,828,114.45.

OVERT ACT NO. (596): Between January 1, 2017 to February 11, 2019, Global Consulting Services (which is controlled by SEAN MCMANUS and JASON SCHROCK) invoiced University Prep for \$216,000.

OVERT ACT NO. (597): Between January 1, 2017 to February 11, 2019, University Prep paid Global Consulting Services \$216,000.

OVERT ACT NO. (598): On or around May 8, 2018, JUSTIN SCHMITT submitted a charter petition and obtain authorization for University Prep from the Dehesa Elementary School District.

OVERT ACT NO. (599): On or around May 8, 2018 JUSTIN SCHMITT informed the Dehesa Elementary School District that University Prep was a standalone charter school focused on university partnerships.

OVERT ACT NO. (600): On or about May 8, 2018, the charter petition for University PREP San Bernardino listed Ceriman, ROBERT WILLIAMS, Eric Johnson, Kevin Tu, Joel Carlson and Lambert Sikkema as founding board members.

OVERT ACT NO. (601): On or about May 8, 2018, the charter petition for University PREP included Articles of Incorporation for the non-profit corporation 'Online of Southern California' (C3966287) to support the charter school, which identified JASON SCHROCK.

OVERT ACT NO. (602): On or about September 20, 2018, Viku Mehta, employee of ROBERT WILLIAMS, submitted an annual business filing for University PREP Charter (C4161006).

OVERT ACT NO. (603): On or about September 20, 2018, annual business filing for University PREP Charter (C4161006) listed Jessica Bulk as the Secretary and Lambert Sikkema as the CFO.

OVERT ACT NO. (604): On or about September 20, 2018, Jessica Bulk and Lambert Sikkema were unaware their names were used on corporate documents.

OVERT ACT NO. (605): On or about September 20, 2018, annual business filing for University PREP Charter (C4161006) listed 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as the corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS. .

UNIVERSITY PREP SAN BERNARDINO:

CHARGES (cont'd)

OVERT ACT NO. (606): On or about April 16, 2018, ELI JOHNSON and JUSTIN SCHMITT submitted a charter petition to and was granted authorization for University PREP San Bernardino by the Trona Joint Unified School District.

OVERT ACT NO. (607): On or around April 16, 2018 JUSTIN SCHMITT informed the Trona Joint Unified School District that University Prep was a standalone charter school focused on university partnerships.

OVERT ACT NO. (608): On or about April 16, 2018, the charter petition for University PREP San Bernardino designated ELI JOHNSON as the lead petitioner and contact for the charter school to Trona Joint Unified School District.

OVERT ACT NO. (609): On or about April 16, 2018, the charter petition for University PREP San Bernardino listed ELI JOHNSON, C Ceriman, ROBERT WILLIAMS, Eric Johnson, Kevin Tu, Joel Carlson and Lambert Sikkema as founding board members.

OVERT ACT NO. (610): On or about April 16, 2018, the charter petition for University PREP San Bernardino included Articles of Incorporation for the non-profit corporation 'Online of Southern California' (C3966287) to support the charter school, which identified JASON SCHROCK.

OVERT ACT NO. (611): On or about July 2, 2018, Viku Mehta, an employee of ROBERT WILLIAMS registered University PREP San Bernardino Charter School (C4170889) as a non-profit corporation.

OVERT ACT NO. (612): On or about July 2, 2018, the business filing for University PREP San Bernardino 3300 Irvine Ave, Suite 330, Newport Beach, CA 92660 as its corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS..

OVERT ACT NO. (613): On or about October 17, 2018, Viku Mehta, an employee of ROBERT WILLIAMS, submitted a business filing for University PREP San Bernardino Charter School (C4170889).

OVERT ACT NO. (614): On or about October 17, 2018, in business filing for University PREP San Bernardino Charter School (C4170889) Rob Sikma was listed as the CEO, Klarc Korver as the Secretary, and Kevin Tu was listed as the CFO and registered agent.

UNIVERSITY PREP FRESNO:

OVERT ACT NO. (615): On or about March 29, 2018, at the direction of JASON SCHROCK, Fernando Napoles submitted a charter petition to and was granted authorization for University PREP Fresno Charter School by the Raisin City Elementary School District.

OVERT ACT NO. (616): On or about March 29, 2018, the charter petition for University Prep Fresno listed Fernando Napoles as the lead petitioner and contact for the school to the Raisin City Elementary School District.

CHARGES (cont'd)

OVERT ACT NO. (617): On or about March 29, 2018, the charter petition for University Prep Fresno listed Fernando Napoles, Jessica Bulk, Lambert Sikkema, Joel Carson and Kevin Tu as the founding board members.

OVERT ACT NO. (618): On or about March 29, 2018, the charter petition for University Prep Fresno included Articles of Incorporation for the non-profit corporation 'Online of Southern California' (C3966287) to support the charter school, which identified JASON SCHROCK.

OVERT ACT NO. (619): On or about November 6, 2018, Rob Sikma registered University PREP Fresno (C4211031) as a non-profit corporation.

OVERT ACT NO. (620): On or about November 6, 2018, business filing for registered University PREP Fresno (C4211031) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as its corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

OVERT ACT NO. (621): On or about November 7, 2018, Viku Mehta, an employee of ROBERT WILLIAMS, submitted an updated business filing for University PREP Fresno (C4211031).

OVERT ACT NO. (622): On or about November 7, 2018, updated business filing for University PREP Fresno (C4211031) listed Rob Sikma as the CEO, Klarc Korver as the Secretary and Kevin Tu as the CFO and registered agent.

CALIFORNIA VANGUARD ACADEMY FRESNO:

OVERT ACT NO. (623): On or about May 1, 2018, at the direction of JASON SCHROCK, Fernando Napoles submitted a charter petition to and was granted authorization for California Vanguard Academy-Fresno Charter School by the Raisin City Elementary School District.

OVERT ACT NO. (624): On or about May 1, 2018, the charter petition for California Vanguard Academy-Fresno identified Fernando Napoles as the lead petition and contact person for the charter school to the Raisin City Elementary School District.

OVERT ACT NO. (625): On or about May 1, 2018, the charter petition for California Vanguard Academy-Fresno listed Fernando Napoles, Jessica Bulk, Lambert Sikkema, Joel Carson and Kevin Tu as the founding board members.

OVERT ACT NO. (626): On or about May 1, 2018, the charter petition for California Vanguard Academy-Fresno included Articles of Incorporation for the non-profit corporation 'Online of Southern California' (C3966287) to support the charter school, which identified JASON SCHROCK.

OVERT ACT NO. (627): On or about November 6, 2018, Rob Sikma registered CA Vanguard Academy (C4211032) as a non-profit corporation.

OVERT ACT NO. (628): On or about November 6, 2018, business filing for registered CA Vanguard Academy (C4211032) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as its corporate address.

CHARGES (cont'd)

OVERT ACT NO. (629): On or about November 7, 2018, Viku Mehta, employee of ROBERT WILLIAMS, submitted an updated business filing for CA Vanguard Academy (C4211032).

OVERT ACT NO. (630): On or about November 7, 2018, updated business filing for CA Vanguard Academy (C4211032) listed Rob Sikma as the CEO, Klarc Korver as the Secretary and Kevin Tu as the CFO and registered agent.

OVERT ACT NO. (631): On or about November 7, 2018, updated business filing for CA Vanguard Academy (C4211032) listed 3300 Irvine Blvd., Suite 330, Newport Beach, CA 92660 as its corporate address which is the address of Charter School Financial Systems, LLC and Williams Accountancy, owned by ROBERT WILLIAMS.

COUNT 7 - PUBLIC MONEYS - MISAPPROPRIATION

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JUSTIN KENT SCHMITT, JASON ALAN SCHROCK, RICHARD BA NGUYEN, NYLA JUNE CRIDER, MICHELLE CLAUDIA KALEHUA KUKAHIKO, and KEALII TROY KUKAHIKO, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, and to the use of another, in violation of PENAL CODE SECTION 424(a)1. Misrepresenting charter school services provided by Prodigy Athletes to obtain additional public funds.

COUNT 8 - PUBLIC MONEYS - MISAPPROPRIATION

On or about and between January 1, 2015 and April 1, 2019, SEAN JOSEPH MCMANUS, JASON ALAN SCHROCK, RICHARD BA NGUYEN, and ROBERT JOHN WILLIAMS, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, and to the use of another, in violation of PENAL CODE SECTION 424(a)1. Charging for services not provided by Academics Arts and Action Charter Academy dba A3 Education to facilitate transferring public funds to A3 Education

COUNT 9 - PUBLIC MONEYS - MISAPPROPRIATION

On or about and between January 1, 2015 and April 1, 2019, SEAN JOSEPH MCMANUS, JASON ALAN SCHROCK, RICHARD BA NGUYEN, and ROBERT JOHN WILLIAMS, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, and to the use of another, in violation of PENAL CODE SECTION 424(a)1. Charging for services not provided by A3 Consulting to facilitate transferring public funds to A3 Consulting

CHARGES (cont'd)

COUNT 10 - PUBLIC MONEYS - MISAPPROPRIATION

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JASON ALAN SCHROCK, RICHARD BA NGUYEN, and ROBERT JOHN WILLIAMS, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, and to the use of another, in violation of PENAL CODE SECTION 424(a)1. Charging for services not provided by Mad Dog Marketing to facilitate transferring public funds to Mad Dog Marketing

COUNT 11 - PUBLIC MONEYS - MISAPPROPRIATION

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JASON ALAN SCHROCK, RICHARD BA NGUYEN, and ROBERT JOHN WILLIAMS, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, and to the use of another, in violation of PENAL CODE SECTION 424(a)1. Charging for services not provided by Global Consulting Services to facilitate transferring public funds to Global Consulting Services

COUNT 12 - PUBLIC MONEYS - MISAPPROPRIATION

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JASON ALAN SCHROCK, and RICHARD BA NGUYEN, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, and to the use of another, in violation of PENAL CODE SECTION 424(a)1. Using public funds designated for one charter school to pay for the expenses of another charter school.

COUNT 13 - PUBLIC MONEYS - MISAPPROPRIATION

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JUSTIN KENT SCHMITT, JASON ALAN SCHROCK, RICHARD BA NGUYEN, NYLA JUNE CRIDER, and ROBERT JOHN WILLIAMS, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, and to the use of another, in violation of PENAL CODE SECTION 424(a)1. Misrepresenting information about student to teacher ratios and expenses on instructional and related services and certificated teacher salaries to receive additional funding.

AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT: And it is further alleged that said defendant, RICHARD BA NGUYEN, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTIONS 186.11(a)(1) and (a)(2).

CHARGES (cont'd)

And it is further alleged that said defendant, RICHARD BA NGUYEN, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than one hundred thousand dollars (\$100,000) but not more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTION 186.11(a)(3).

AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT: And it is further alleged that said defendant, JUSTIN KENT SCHMITT, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTIONS 186.11(a)(1) and (a)(2).

And it is further alleged that said defendant, JUSTIN KENT SCHMITT, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than one hundred thousand dollars (\$100,000) but not more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTION 186.11(a)(3).

COUNT 14 - PUBLIC MONEYS - MISAPPROPRIATION

On or about and between January 1, 2016 and April 4, 2019, SEAN JOSEPH MCMANUS and STEVEN BRAIN ZANT, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, and to the use of another, in violation of PENAL CODE SECTION 424(a)1. Administratively transferring students between charter schools they control to receive additional state funding without parent consent.

COUNT 15 - PUBLIC MONEYS - MISAPPROPRIATION

On or about and between January 1, 2016 and April 1, 2019, NANCY CAROLE HAUER, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, and to the use of another, in violation of PENAL CODE SECTION 424(a)1. Charging for oversight fees above actual costs.

CHARGES (cont'd)

COUNT 16 - PUBLIC MONEYS - MISAPPROPRIATION

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JUSTIN KENT SCHMITT, JASON ALAN SCHROCK, RICHARD BA NGUYEN, NYLA JUNE CRIDER, and MICHELLE CLAUDIA KALEHUA KUKAHIKO, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, and to the use of another, in violation of PENAL CODE SECTION 424(a)1. Paying vendors of charter for student identification information to increase average daily attendance and generate additional public funds.

AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT: And it is further alleged that said defendant, NYLA JUNE CRIDER, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTIONS 186.11(a)(1) and (a)(2).

And it is further alleged that said defendant, NYLA JUNE CRIDER, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than one hundred thousand dollars (\$100,000) but not more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTION 186.11(a)(3).

COUNT 17 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JASON ALAN SCHROCK, RICHARD BA NGUYEN, and ROBERT JOHN WILLIAMS did unlawfully take and steal money and personal property of another, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).Charging for services not provided by Academics Arts and Action Charter Academy dba A3 Education to facilitate transferring funds to A3 Education

COUNT 18 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JASON ALAN SCHROCK, RICHARD BA NGUYEN, and ROBERT JOHN WILLIAMS did unlawfully take and steal money and personal property of another, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).Charging for services not provided by A3 Consulting to facilitate transferring funds to A3 Consulting

CHARGES (cont'd)

COUNT 19 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JASON ALAN SCHROCK, RICHARD BA NGUYEN, and ROBERT JOHN WILLIAMS did unlawfully take and steal money and personal property of another, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a). Charging for services not provided by Mad Dog Marketing to facilitate transferring funds to Mad Dog Marketing

COUNT 20 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, JASON ALAN SCHROCK, RICHARD BA NGUYEN, and ROBERT JOHN WILLIAMS did unlawfully take and steal money and personal property of another, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a). Charging for services not provided by Global Consulting Services to facilitate transferring funds to Global Consulting Services

COUNT 21 - PUBLIC MONEYS - MISAPPROPRIATION

On or about and between January 1, 2016 and April 1, 2019, SEAN JOSEPH MCMANUS, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, and to the use of another, in violation of PENAL CODE SECTION 424(a)1. Directing employees to backdate master agreements to receive additional public funds

COUNT 22 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between January 1, 2016 and April 1, 2019, MICHELLE CLAUDIA KALEHUA KUKAHIKO, being a registrar of a Public Charter School, Valiant Charter Schools, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Prodigy Athlete, a Company Michelle Claudia Kalehua Kukahiko owned and operated, in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 23 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between June 28, 2018 and January 31, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operator of a Public Charter School, CA STEAM San Bernardino, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Consulting, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 24 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between May 2, 2017 and December 3, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of California STEAM San Bernardino, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Education, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 25 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between June 8, 2017 and January 15, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of California STEAM San Bernardino, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting services, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 26 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and October 29, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of California STEAM San Bernardino, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Mad Dog Marketing, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 27 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between June 28, 2018 and January 31, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK, being a Operators of California STEAM Santa Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Consulting, a Company McManus and Schrock owned and operated, in violation of GOVERNMENT CODE SECTION 1090.

COUNT 28 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between March 15, 2017 and May 11, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK, being a Operators of California STEAM Santa Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Education, a Company McManus and Schrock and operated, in violation of GOVERNMENT CODE SECTION 1090.

COUNT 29 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between June 8, 2017 and January 15, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK, being a Operators of California STEAM San Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting Services, a Company McManus and Schrock owned and operated, in violation of GOVERNMENT CODE SECTION 1090.

COUNT 30 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 1, 2018 and December 31, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK, being a Operators of California STEAM Santa Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Mad Dog Marketing, a Company McManus and Schrock owned and operated, in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 31 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and February 8, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of California STEAM Sonoma II, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting Services, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 32 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 1, 2018 and November 21, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of California STEAM Sonoma II, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Mad Dog Marketing, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 33 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 1, 2018 and January 16, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of California Academy of Sports Science, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Consulting, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 34 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 1, 2018 and November 29, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of California Academy of Sports Science, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Education, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 35 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 1, 2018 and November 7, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of California Academy of Sports Science, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting Services, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 36 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 1, 2018 and December 3, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of California Academy of Sports Science, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Mad Dog Marketing, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 37 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between June 28, 2018 and January 31, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California North Charter, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Consulting, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 38 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between February 7, 2017 and February 28, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California North Charter, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Education, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 39 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and January 15, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California North Charter, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting Services, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 40 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and December 5, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California North Charter, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Mad Dog Marketing, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 41 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 1, 2018 and January 31, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California Santa Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Consulting, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 42 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between February 5, 2018 and April 7, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California Santa Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Education, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 43 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and January 15, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California Santa Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting Services, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 44 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and December 3, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California Santa Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Mad Dog Marketing, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 45 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between June 28, 2018 and January 31, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California South Charter, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Consulting, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 46 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between February 7, 2018 and February 28, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California South Charter, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Education, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 47 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and January 15, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California South Charter, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting Services, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 48 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and December 3, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift California South Charter, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Mad Dog Marketing, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 49 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2018 and January 8, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of University Prep, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Consulting, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 50 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between January 15, 2019 and April 5, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of University Prep, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting Services, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 51 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and February 5, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift Monterey, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Consulting, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 52 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between May 2, 2017 and May 4, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift Monterey, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Education, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 53 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 1, 2017 and June 8, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift Monterey, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting Services, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 54 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 1, 2017 and December 3, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Uplift Monterey, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Mad Dog Marketing, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 55 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and February 8, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy of Los Angeles, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Consulting, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 56 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between May 11, 2017 and February 5, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy of Los Angeles, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Education, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 57 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between June 24, 2017 and June 8, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy of Los Angeles, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting Services, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 58 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and December 19, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy of Los Angeles, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Mad Dog Marketing, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 59 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 1, 2018 and January 31, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy of Southern California, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Consulting, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 60 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between May 11, 2017 and January 28, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy of Southern California, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Education, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 61 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 21, 2017 and June 8, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy of Southern California, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting Services, a Company McManus and Schrock and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 62 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between July 1, 2018 and November 29, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy of Southern California, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Mad Dog Marketing, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 63 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and January 13, 2019, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy Santa Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Consulting, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 64 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and October 25, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy Santa Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with A3 Education, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

CHARGES (cont'd)

COUNT 65 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and June 22, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy Santa Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Global Consulting Services, a Company McManus and Schrock owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

COUNT 66 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between September 30, 2017 and November 29, 2018, SEAN JOSEPH MCMANUS and JASON ALAN SCHROCK , being a Operators of Valiant Academy Santa Barbara, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Mad Dog Marketing, a Company McManus owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT: And it is further alleged that said defendant, SEAN JOSEPH MCMANUS, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTIONS 186.11(a)(1) and (a)(2).

And it is further alleged that said defendant, SEAN JOSEPH MCMANUS, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than one hundred thousand dollars (\$100,000) but not more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTION 186.11(a)(3).

AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT: And it is further alleged that said defendant, JASON ALAN SCHROCK, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTIONS 186.11(a)(1) and (a)(2).

CHARGES (cont'd)

And it is further alleged that said defendant, JASON ALAN SCHROCK, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than one hundred thousand dollars (\$100,000) but not more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTION 186.11(a)(3).

COUNT 67 - CONFLICT OF INTEREST - SPECIFIED OFFICIALS

On or about and between December 1, 2016 and April 8, 2019, ROBERT JOHN WILLIAMS , being a Board member of Cal Prep Sutter, a Public Charter School, and thus an officer and person prohibited by the laws of this state (Government Code Section 1090) from being financially interested in contracts made by him in his official capacity, and by a body or board of which he was a member; and from being a purchaser at any sale made by him in his official capacity; and from being a vendor at any purchase made by him in his official capacity, did willfully and unlawfully violate the provisions of such laws, by Contracting with Williams Accountancy, a Company Robert Williams owned and operated ,in violation of GOVERNMENT CODE SECTION 1090.

THIS INDICTMENT, NUMBERED SCD266439, CONSISTS OF 67 COUNTS.

"A TRUE BILL"

Summer Stephan

District Attorney, County of San Diego, State of California

Foreman of the Grand Jury

/s/ Leon Schorr

Deputy District Attorney

DATE: _____

DATE: _____

NAMES OF WITNESSES EXAMINED BEFORE FILING FOREGOING INDICTMENT:

1. Ally Adair-Chung
2. Brian Afoa
3. Arnold Ale
4. Michael Ammermon
5. Sara Browne
6. Jessica Sikkema (Bulk)
7. Anna Buxbaum
8. Noemi Carvajal
9. Mark Cupp, Jr.
10. Lynn David
11. Elizabeth Eaton
12. Sima Engelstein
13. Darrin Erb
14. Aaron Flowers
15. Andrea Franco
16. Earl Franklin
17. Shannon Giese
18. Bill Harkavy
19. Daniel Harward
20. Jeffrey Hill
21. Craig Holiday

22. Michelle Holiday
23. Donald Holmes
24. David Iorillo
25. Damian Jenkins
26. Eric Johnson
27. Amanda Keegan
28. Lawrence King
29. Charlie Kohler
30. Klarc Korver
31. Daniel Lee
32. Vince Lobendahn
33. Enriqueta Luquin
34. Bette Mackey
35. George Malau'ulu
36. April Genevieve Mau
37. Mike Mau
38. Amy McCamly
39. Vikrant Mehta
40. Caryn Moore
41. Fernando Napoles
42. Dana Pedersen
43. Debbie Pooler
44. Francis Price

- 45.Christopher Rafanelli
- 46.Chris Rahe
- 47.Rita Reese
- 48.Luis Rigney
- 49.Mike Rogers
- 50.Scott Rungwerth
- 51.Juan Sandoval
- 52.Keri Anne Schneeweiss
- 53.Leonard Anthoyn Shryock
- 54.Savaii Seau
- 55.Micah Seau
- 56.Lambert Sikkema
- 57.Robert Sikma
- 58.Angela Slepak
- 59.Justin Smith
- 60.Anne Sykes
- 61.Sam Tai (Samuela)
- 62.Toalei Talataina
- 63.Shellie Thomas
- 64.(Edward) Keith Tomes
- 65.Ian Trejo
- 66.Ryan Valentine

67. Deidre Walsh

68. Natalie Walters

69. Robert Williams

70. Maureen Williams

71. Kevin Tu

72. Deanna Zamiska