

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

04/08/2016
08:00 AM

ALAN CARLSON, Clerk of the Court
16CF0911

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 CHRISTOPHER W SCHLEGEL 12/29/79) OCSO 13-003820
B7115115) SANTA ANA
12 AKA CHRISTOPHER WALTER SCHLEGEL)
13 CHRISTOPHER WALTER SCHLEGSL)
CHRISTOPHER WALTER SCHLEGER)
14 JOURDAN TYSON GROVES 10/09/78)
15 B5191594)
16 MICHAEL RUFFNER 07/13/65)
C1644721)
17 MICHAEL SCOTT MELCHER 08/20/60)
18 N6733472)
19 Defendant(s))

20 The Orange County District Attorney charges that in Orange
21 County, California, the law was violated as follows:

22 COUNT 1: On or about March 23, 2012, in violation of Section
23 25401 of the Corporations Code (USING UNTRUE STATEMENT IN
24 PURCHASE/SALE OF A SECURITY), a FELONY, CHRISTOPHER W SCHLEGEL,
25 JOURDAN TYSON GROVES, MICHAEL RUFFNER and MICHAEL SCOTT MELCHER
26 did unlawfully offer and sell, and buy and offer to buy, a
27 security by means of a written or oral communication which
28 included an untrue statement of a material fact and omitted a
material fact necessary to make the statements, in light of the
circumstances, not misleading. To wit: \$250,000

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1 COUNT 2: On or about February 06, 2012, in violation of Section
2 25401 of the Corporations Code (USING UNTRUE STATEMENT IN
3 PURCHASE/SALE OF A SECURITY), a FELONY, CHRISTOPHER W SCHLEGEL,
4 JOURDAN TYSON GROVES, MICHAEL RUFFNER and MICHAEL SCOTT MELCHER
5 did unlawfully offer and sell, and buy and offer to buy, a
6 security by means of a written or oral communication which
7 included an untrue statement of a material fact and omitted a
8 material fact necessary to make the statements, in light of the
9 circumstances, not misleading. To wit:\$50,000

10 COUNT 3: On or about June 18, 2012, in violation of Section
11 25401 of the Corporations Code (USING UNTRUE STATEMENT IN
12 PURCHASE/SALE OF A SECURITY), a FELONY, CHRISTOPHER W SCHLEGEL,
13 JOURDAN TYSON GROVES, MICHAEL RUFFNER and MICHAEL SCOTT MELCHER
14 did unlawfully offer and sell, and buy and offer to buy, a
15 security by means of a written or oral communication which
16 included an untrue statement of a material fact and omitted a
17 material fact necessary to make the statements, in light of the
18 circumstances, not misleading. To wit:\$200,000 (paid back
19 \$12,920)

20 COUNT 4: On or about and between October 23, 2012 and December
21 31, 2012, in violation of Section 25401 of the Corporations Code
22 (USING UNTRUE STATEMENT IN PURCHASE/SALE OF A SECURITY), a
23 FELONY, CHRISTOPHER W SCHLEGEL, JOURDAN TYSON GROVES, MICHAEL
24 RUFFNER and MICHAEL SCOTT MELCHER did unlawfully offer and
25 sell, and buy and offer to buy, a security by means of a
26 written or oral communication which included an untrue statement
27 of a material fact and omitted a material fact necessary to make
28 the statements, in light of the circumstances, not misleading.
To wit:\$43,000

COUNT 5: On or about November 16, 2012, in violation of Section
25401 of the Corporations Code (USING UNTRUE STATEMENT IN
PURCHASE/SALE OF A SECURITY), a FELONY, JOURDAN TYSON GROVES,
MICHAEL RUFFNER and MICHAEL SCOTT MELCHER did unlawfully offer
and sell, and buy and offer to buy, a security by means of a
written or oral communication which included an untrue statement
of a material fact and omitted a material fact necessary to make
the statements, in light of the circumstances, not misleading.
To wit:\$50,000

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1 COUNT 6: On or about November 30, 2012, in violation of Section
2 25401 of the Corporations Code (USING UNTRUE STATEMENT IN
3 PURCHASE/SALE OF A SECURITY), a FELONY, JOURDAN TYSON GROVES,
4 MICHAEL RUFFNER and MICHAEL SCOTT MELCHER did unlawfully offer
5 and sell, and buy and offer to buy, a security by means of a
6 written or oral communication which included an untrue statement
7 of a material fact and omitted a material fact necessary to make
8 the statements, in light of the circumstances, not misleading.
9 To wit:\$30,000

10 COUNT 7: On or about December 07, 2012, in violation of Section
11 25401 of the Corporations Code (USING UNTRUE STATEMENT IN
12 PURCHASE/SALE OF A SECURITY), a FELONY, JOURDAN TYSON GROVES,
13 MICHAEL RUFFNER and MICHAEL SCOTT MELCHER did unlawfully offer
14 and sell, and buy and offer to buy, a security by means of a
15 written or oral communication which included an untrue statement
16 of a material fact and omitted a material fact necessary to make
17 the statements, in light of the circumstances, not misleading.
18 To wit:\$50,000

19 COUNT 8: On or about September 13, 2013, in violation of Section
20 25401 of the Corporations Code (USING UNTRUE STATEMENT IN
21 PURCHASE/SALE OF A SECURITY), a FELONY, JOURDAN TYSON GROVES,
22 MICHAEL RUFFNER and MICHAEL SCOTT MELCHER did unlawfully offer
23 and sell, and buy and offer to buy, a security by means of a
24 written or oral communication which included an untrue statement
25 of a material fact and omitted a material fact necessary to make
26 the statements, in light of the circumstances, not misleading.
27 To wit:\$50,000

28 COUNT 9: On or about and between June 26, 2014 and July 03,
2014, in violation of Section 25401 of the Corporations Code
(USING UNTRUE STATEMENT IN PURCHASE/SALE OF A SECURITY), a
FELONY, JOURDAN TYSON GROVES, MICHAEL RUFFNER and MICHAEL SCOTT
MELCHER did unlawfully offer and sell, and buy and offer to
buy, a security by means of a written or oral communication
which included an untrue statement of a material fact and
omitted a material fact necessary to make the statements, in
light of the circumstances, not misleading. To wit:\$50,000

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1 COUNT 10: On or about September 06, 2013, in violation of
2 Section 25401 of the Corporations Code (USING UNTRUE STATEMENT
3 IN PURCHASE/SALE OF A SECURITY), a FELONY, JOURDAN TYSON GROVES,
4 MICHAEL RUFFNER and MICHAEL SCOTT MELCHER did unlawfully offer
5 and sell, and buy and offer to buy, a security by means of a
6 written or oral communication which included an untrue statement
7 of a material fact and omitted a material fact necessary to make
8 the statements, in light of the circumstances, not misleading.
9 To wit:\$150,000

10 COUNT 11: On or about and between April 16, 2014 and June 26,
11 2014, in violation of Section 25401 of the Corporations Code
12 (USING UNTRUE STATEMENT IN PURCHASE/SALE OF A SECURITY), a
13 FELONY, JOURDAN TYSON GROVES, MICHAEL RUFFNER and MICHAEL SCOTT
14 MELCHER did unlawfully offer and sell, and buy and offer to
15 buy, a security by means of a written or oral communication
16 which included an untrue statement of a material fact and
17 omitted a material fact necessary to make the statements, in
18 light of the circumstances, not misleading. To wit:\$200,000

19 COUNT 12: On or about January 06, 2014, in violation of Section
20 25401 of the Corporations Code (USING UNTRUE STATEMENT IN
21 PURCHASE/SALE OF A SECURITY), a FELONY, JOURDAN TYSON GROVES,
22 MICHAEL RUFFNER and MICHAEL SCOTT MELCHER did unlawfully offer
23 and sell, and buy and offer to buy, a security by means of a
24 written or oral communication which included an untrue statement
25 of a material fact and omitted a material fact necessary to make
26 the statements, in light of the circumstances, not misleading.
27 To wit:\$50,000 (subtract \$27k paid back \$8k loss

28 COUNT 13: On or about and between February 06, 2012 and June
29 26, 2014, in violation of Section 25541 of the Corporations Code
30 (USE OF DEVICE, SCHEME TO DEFRAUD), a FELONY, CHRISTOPHER W
31 SCHLEGEL, JOURDAN TYSON GROVES, MICHAEL RUFFNER and MICHAEL
32 SCOTT MELCHER did willfully and unlawfully employ, directly and
33 indirectly, a device, scheme, or artifice to defraud in
34 connection with the offer, purchase, or sale of a security, and
35 willfully engage, directly and indirectly, in an act, practice,
36 or course of business which operated or would have operated as a
37 fraud or deceit upon a person in connection with the offer,
38 purchase, and sale of a security. To wit:\$1,118,080.00

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1 It is further alleged pursuant to Penal Code section 186.11(a)
2 (1)/(3) (AGGRAVATED WHITE COLLAR CRIME - OVER \$100,000), that as
3 to counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13,
4 defendants JOURDAN TYSON GROVES, MICHAEL RUFFNER and MICHAEL
5 SCOTT MELCHER engaged in a pattern of related fraudulent felony
6 conduct involving the taking of more than one hundred thousand
7 dollars (\$100,000) but less than five hundred thousand dollars
8 (\$500,000).

7 It is further alleged pursuant to Penal Code section 186.11(a)
8 (1)/(2) (AGGRAVATED WHITE COLLAR CRIME - OVER \$500,000), that as
9 to counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13,
10 defendants JOURDAN TYSON GROVES, MICHAEL RUFFNER and MICHAEL
11 SCOTT MELCHER engaged in a pattern of related fraudulent felony
12 conduct involving the taking of more than five hundred thousand
13 dollars (\$500,000).

12 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13, it
13 is further alleged pursuant to Penal Code section 12022.6(a)(1)
14 (PROPERTY DAMAGE/LOSS OVER \$65,000), that JOURDAN TYSON GROVES,
15 MICHAEL RUFFNER and MICHAEL SCOTT MELCHER intentionally took,
16 damaged, and destroyed property valued in excess of sixty-five
17 thousand dollars (\$65,000) during the commission and attempted
18 commission of the above offense.

17 As to Count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13, it
18 is further alleged pursuant to Penal Code section 12022.6(a)(2)
19 (PROPERTY LOSS OVER \$200,000), that JOURDAN TYSON GROVES,
20 MICHAEL RUFFNER and MICHAEL SCOTT MELCHER intentionally took,
21 damaged, and destroyed property valued in excess of two hundred
22 thousand dollars (\$200,000) during the commission and attempted
23 commission of the above offense.

23 I declare under penalty of perjury, on information and belief,
24 that the foregoing is true and correct.

25 Dated 04-07-2016 at Orange County, California.
26 ML/DM 16F01309

27 TONY RACKAUCKAS, DISTRICT ATTORNEY

28 by: /s/ MICHELLE LIPTON
MICHELLE LIPTON, Deputy District Attorney

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RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

BAIL RECOMMENDATION:

CHRISTOPHER W SCHLEGEL - \$ 530,000.00
JOURDAN TYSON GROVES - \$ 1,000,000.00
MICHAEL RUFFNER - \$ 1,000,000.00
MICHAEL SCOTT MELCHER - \$ 1,000,000.00

NOTICES:

The People request that defendant and counsel disclose, within 15 days, all of the materials and information described in Penal Code section 1054.3, and continue to provide any later-acquired materials and information subject to disclosure, and without further request or order.