

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO  1437 Bannock Street Denver, CO 80202	DATE FILED: September 22, 2017 12:13 PM FILING ID: E69C27746FA77 CASE NUMBER: 2017CR926
<b>THE PEOPLE OF THE STATE OF          COLORADO</b>  Plaintiff,  vs.  <b>SONYA D. CAMARCO, DOB: 10/22/1971</b>  Defendant.	<b>▲ COURT USE ONLY ▲</b>
CYNTHIA H. COFFMAN, Attorney General SEAN CLIFFORD, #28260 * First Assistant Attorney General CRYSTAL C. LITRELL, #36814 * Senior Assistant Attorney General 1300 Broadway, 9 <sup>th</sup> Floor Denver, CO 80203 (720) 508-6000 * Counsel Of Record	Case No.: 2017CR001  Ctrm.: 259
<b>COLORADO STATE GRAND JURY INDICTMENT</b>	

- COUNT ONE: SECURITIES FRAUD, §§ 11-51-501(1)(c) and 11-51-603(1), C.R.S. (Class 3 Felony) {50053} {as to Cheryl Fillenberg, Carol Fillenberg, and Eugenia Fillenberg}
- COUNT TWO: THEFT \$1,000 - \$20,000, §18-4-401(1)(2)(c) C.R.S. 2012 (Class 4 Felony), {0801U} { as to Cheryl Fillenberg, Carol Fillenberg, and Eugenia Fillenberg }
- COUNT THREE: THEFT \$100,000 - \$1,000,000, §18-4-401(1),(2)(I) C.R.S. (Class 3 Felony), {08A16} { as to Cheryl Fillenberg, Carol Fillenberg, and Eugenia Fillenberg }
- COUNT FOUR: SECURITIES FRAUD, §§ 11-51-501(1)(c) and 11-51-603(1), C.R.S. (Class 3 Felony) {50053} {as to Deborah Lynn DeSantis, Lucas DeSantis, Raquel DeSantis}

- COUNT FIVE: THEFT \$1,000 - \$20,000, §18-4-401(1)(2)(c) C.R.S. 2012 (Class 4 Felony), {0801U} {as to Deborah Lynn DeSantis, Lucas DeSantis, and Raquel DeSantis}
- COUNT SIX: THEFT \$100,000 - \$1,000,000, §18-4-401(1),(2)(I) C.R.S. (Class 3 Felony), {08A16} {as to Deborah Lynn DeSantis, Lucas DeSantis, and Raquel DeSantis}
- COUNT SEVEN: SECURITIES FRAUD, §§ 11-51-501(1)(c) and 11-51-603(1), C.R.S. (Class 3 Felony) {50053} {as to Kathleen Gentry}
- COUNT EIGHT: THEFT \$5,000 - \$20,000, §18-4-401(1),(2)(g) C.R.S. (Class 5 Felony), {08A14} {as to Kathleen Gentry}
- COUNT NINE: SECURITIES FRAUD, §§ 11-51-501(1)(c) and 11-51-603(1), C.R.S. (Class 3 Felony) {50053} {as to Elizabeth Lautman}
- COUNT TEN: THEFT \$100,000 - \$1,000,000, §18-4-401(1),(2)(I) C.R.S. (Class 3 Felony), {08A16} {as to Elizabeth Lautman}
- COUNT ELEVEN: SECURITIES FRAUD, §§ 11-51-501(1)(c) and 11-51-603(1), C.R.S. (Class 3 Felony) {50053} {as to Jo-Ann Lautman}
- COUNT TWELVE: THEFT \$100,000 - \$1,000,000, §18-4-401(1),(2)(I) C.R.S. (Class 3 Felony), {08A16} {as to Jo-Ann Lautman }
- COUNT THIRTEEN: SECURITIES FRAUD, §§ 11-51-501(1)(c) and 11-51-603(1), C.R.S. (Class 3 Felony) {50053} {as to Pamela Desmond, Keith J. Robertson, Kellye Robertson, and Marjorie Wilson Symonds}

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PEOPLE OF THE STATE OF COLORADO,  Plaintiff,  v.  SONYA D. CAMARCO, DOB: 10/22/1971  Defendant.	
CYNTHIA H. COFFMAN, Attorney General SEAN CLIFFORD, #28260 * First Assistant Attorney General CRYSTAL C. LITTRELL, #36814 * Senior Assistant Attorney General 1300 Broadway, 9 <sup>th</sup> Floor Denver, CO 80203 (720) 508-6733 * Counsel Of Record	▲ COURT USE ONLY ▲  Case No.:  Ct. Rm.
<b>COLORADO STATE GRAND JURY INDICTMENT</b>	

Of the 2017-2018 term of the City and County of Denver Court in the year 2017, the 2017-2018 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

**ESSENTIAL FACTS**

Sonya Camarco ("Camarco") was a licensed investment adviser and an independent registered representative for LPL Financial LLC ("LPL") from February 2004 to August of 2017. LPL is a registered broker-dealer and investment adviser. Camarco worked as an independent adviser for LPL out of an office at 7035 Campus Drive in Colorado Springs, Colorado. Camarco sold financial products and services to clients. Camarco provided investment advice and managed certain investments for clients. In her capacity as a registered representative of a broker-dealer, Camarco was able to conduct trades of various investments on behalf of

clients. LPL permitted agents to trade investments approved by LPL. LPL explicitly prohibited “selling away” from LPL into investments outside of LPL and not otherwise sanctioned by LPL. In particular, agents were not permitted to have direct involvement with outside investments where they have an interest or which is not approved by LPL. Camarco acknowledged this requirement by signing and acknowledging such a memorandum titled, “Private Securities Transactions/Selling Away.” This document is dated January 13, 2004. Camarco had a fiduciary responsibility towards her clients in her capacity as an investment adviser.

According to LPL policy, Camarco was not allowed to access client funds or withdraw money from client accounts without express client authorization prior to withdrawing the funds.

Camarco is the registered agent of “Camarco Investments” according to the Articles of Incorporation filed with the Colorado Secretary of State. The principal address listed for Camarco Investments, Inc., according to Colorado Secretary of State records, is 7035 Campus Drive, Suite 703, Colorado Springs, Colorado.

In July of 2017, LPL conducted an internal investigation of Camarco’s activities after a purported request by one of Camarco’s clients to issue a check drawn on the client’s account and made payable to “C Investments” was flagged by a division of LPL. Over the course of the investigation, it was learned that numerous checks drawn on several client accounts were issued and made payable to “C Investments.” The checks made payable to “C Investments” and drawn on client accounts were endorsed by Camarco and deposited into an account at First Bank in the name of “Camarco Investments, Inc.” Camarco personally endorsed many of these third party checks and deposited them into her Camarco Investments account. The primary account of “Camarco Investments” was held at First Bank. Camarco was the signatory on the “Camarco Investments” account. Camarco submitted unauthorized LPL disbursement documents to LPL that caused checks drawn on client investment accounts and made payable to “C Investments” to be issued. Clients did not authorize the disbursements. Neither “Camarco Investments” nor “C Investments” were outside investments that had been authorized by LPL.

From January 3, 2013 to May 31, 2017 Camarco obtained client funds without authorization. At no time did Camarco disclose to investors the true nature and purpose of “C Investments” or “Camarco Investments.” Camarco omitted to inform investors that their investment money was being taken by Camarco for non-investment related purposes and was no longer going to be held by LPL for their benefit. Camarco did not inform investors that she caused their signatures to be placed on LPL check authorization forms that permitted the disbursement of investor funds to “Camarco Investments” without their authorization.

Funds deposited into the “Camarco Investments” account were not utilized for investments on behalf of named investors. In fact, funds were utilized by Camarco for various personal expenditures including, but not limited to, credit card payments, transfers to other accounts, taxes, personal uses, and automotive expenses. Money deposited into this account was not returned to investors or otherwise used for investments on behalf of investors.

LPL trades in investments such as equities, stocks, mutual funds, options, and bonds that constitute securities under the Colorado Securities Act.

All investors set forth in Counts One through Thirteen, below, became aware that unauthorized third party checks were issued from their accounts when they were contacted by LPL investigators. LPL became concerned about Camarco’s conduct and commenced its investigation of Camarco on July 27, 2017, when a third-party check request was flagged through LPL’s internal review processes and escalated to the SIU.

**COUNT ONE:**

(Securities Fraud – F3)

C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1) {as to Cheryl Fillenberg, Carol Fillenberg, and Eugenia Fillenberg}

On and between January 3, 2013 and December 19, 2014, in and triable in the State of Colorado, SONYA D. CAMARCO, in connection with the offer or sale of any security, directly or indirectly, unlawfully, feloniously, and willfully engaged in any act, practice or course of business which operated or would have operated as fraud or deceit upon investors, including Cheryl Fillenberg, Carol Fillenberg, and Eugenia Fillenberg, contrary to the form of the statutes in such case made and provided, C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1), and against the peace and dignity of the People of the State of Colorado.

**COUNT TWO:**

(Theft - \$1,000 - \$20,000 – F4)

C.R.S. § 18-4-401(1),(2)(c) (2012)

{As to Cheryl Fillenberg, Carol Fillenberg, and Eugenia Fillenberg}

On or about January 3, 2013, in and triable in the State of Colorado, with a date of discovery on or about July 27, 2017, SONYA D. CAMARCO, unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money, of Cheryl Fillenberg, Carol Fillenberg, and Eugenia Fillenberg, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned money in such manner as to deprive Cheryl Fillenberg, Carol Fillenberg, and Eugenia Fillenberg permanently of its use or benefit in violation of section 18-4-401(1)(a),(2)(c), C.R.S. (2012).

**COUNT THREE:**

(Theft - \$100,000 - \$1,000,000 – F3)

C.R.S. § 18-4-401(1),(2)(i)

{As to Cheryl Fillenberg, Carol Fillenberg, and Eugenia Fillenberg}

On and between March 7, 2014 and December 19, 2014, with the last act in the series of acts committed on or about December 19, 2014, and with a date of discovery on or about July 27, 2017, in and triable in the State of Colorado, SONYA D. CAMARCO, unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money, of Cheryl Fillenberg, Carol Fillenberg, and Eugenia Fillenberg, without authorization, or by threat or deception, and did knowingly use, conceal or abandon the money in such a manner as to permanently deprive Cheryl Fillenberg, Carol Fillenberg, and Eugenia Fillenberg of its use or benefit; and the value of said money was one hundred thousand dollars or more but less than one million dollars, in violation of section 18-4-401(1)(b),(2)(i), C.R.S.

The facts supporting Counts One through Three include, but are limited to, the following:

1. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts One through Three by this reference.
2. Sisters Cheryl Fillenberg and Carol Fillenberg were clients of LPL and held several accounts individually and in combination with other family members. Joint accounts include accounts with their mother, Eugenia Fillenberg.

(Jointly, all individual and joint accounts are referred to as the "Fillenberg accounts.") Camarco served as a financial advisor and brokerage account executive for the Fillenberg accounts. Camarco provided advice and executed trades on behalf of Fillenberg accounts. Camarco recommended bonds, stocks, mutual funds, and equity traded funds. Cheryl Fillenberg was the primary contact for the Fillenberg accounts over the last few years and understood that investment funds were only for buying equities, bonds, mutual funds and equity traded funds. Camarco communicated sporadically with Cheryl Fillenberg.

3. When Camarco wanted to conduct a trade from one of the Fillenberg accounts, Camarco would contact Cheryl Fillenberg in advance to obtain authorization. Camarco did not have discretionary authority to trade in any of the Fillenberg Accounts without authorization. Camarco was not an authorized signatory on any of the Fillenberg accounts.
4. On one occasion, Cheryl Fillenberg requested statements and confirmations from her mother, Eugenia Fillenberg's, accounts. Eugenia Fillenberg was suffering from diminished mental capacity due to dementia. Camarco promised to provide these documents but never did.
5. An LPL investigator contacted Cheryl Fillenberg regarding third-party checks they had identified which were drawn on the Fillenberg accounts and made payable to "C Investments." At no time prior to this call had Cheryl Fillenberg or Carol Fillenberg authorized checks to be issued on any of the Fillenberg accounts to be made payable "C Investments" or "Camarco Investments." Eugenia Fillenberg did not have the capacity to authorize these checks.
6. Cheryl Fillenberg reviewed five third-party checks that were issued to "C Investments" and drawn on the Fillenberg accounts at LPL. Four third-party checks dated January 3, 2013 through September 18, 2014, totaling \$90,924.21, were drawn on the Fillenberg accounts at LPL and made payable to "C Investments" without authorization. The checks state that they are for the benefit of Eugenia Fillenberg. One third-party check dated December 18, 2014 totaling \$28,000 was drawn on the Fillenberg accounts at LPL and was made payable to "C Investments" without authorization. This check states that it is for the benefit of Cheryl and Carol Fillenberg. All checks were mailed to 10940 S. Parker Road, #518, Parker, Douglas County, Colorado.
7. Cheryl and Carol Fillenberg reviewed two documents entitled, "Check to a Third Party of Alternate Address." These documents were provided by an

LPL investigator and appear to bear the signature of Eugenia Fillenberg above the words "Account Holder Signature" authorizing checks to be issued to "C Investments" on February 28, 2014 and September 16, 2014. In general, this document authorizes a check drawn on the account of the investor to be issued to a third party. Cheryl and Carol Fillenberg reviewed these documents and affirmed that they did not believe their mother Eugenia Fillenberg signed these documents or authorized her signature to be placed on the document.

8. Cheryl and Carol Fillenberg reviewed a document entitled, "Check to a Third Party of Alternate Address," that was provided by an LPL investigator and which appears to bear the signatures of Cheryl and Carol Fillenberg above the words "Account Holder Signature" authorizing a check to be issued to "C Investments" on December 19, 2014. Cheryl and Carol Fillenberg reviewed this document and affirmed that they did not sign this document or authorize their signatures to be placed on the document.
9. In total, \$118,924.21 was removed from the Fillenberg accounts without authorization.

**COUNT FOUR:**

(Securities Fraud – F3)

C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1) {as to Deborah Lynn DeSantis, Lucas DeSantis, and Raquel DeSantis}

On and between March 28, 2013 and November 15, 2016, in and triable in the State of Colorado, SONYA D. CAMARCO, in connection with the offer or sale of any security, directly or indirectly, unlawfully, feloniously, and willfully engaged in any act, practice, or course of business which operated or would have operated as fraud or deceit upon investors, including Deborah Lynn DeSantis, Lucas DeSantis, and Raquel DeSantis, contrary to the form of the statutes in such case made and provided, C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1), and against the peace and dignity of the People of the State of Colorado.



**COUNT FIVE:**

(Theft - \$1,000 - \$20,000 – F4)

C.R.S. § 18-4-401(1),(2)(c) (2012)

{As to Deborah Lynn DeSantis, Lucas DeSantis, and Raquel DeSantis }

On or about March 28, 2013, in and triable in the State of Colorado, with a date of discovery on or about July 27, 2017, SONYA D. CAMARCO, unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money, of Deborah Lynn DeSantis, Lucas DeSantis, and Raquel DeSantis, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned money in such manner as to deprive Deborah Lynn DeSantis, Lucas DeSantis, and Raquel DeSantis permanently of its use or benefit in violation of section 18-4-401(1)(a),(2)(c), C.R.S. (2012).

**COUNT SIX:**

(Theft - \$100,000 - \$1,000,000 – F3)

C.R.S. § 18-4-401(1),(2)(i)

{As to Deborah Lynn DeSantis, Lucas DeSantis, and Raquel DeSantis}

On and between November 4, 2013 and November 15, 2016, with the last act in the series of acts committed on or about November 28, 2016, and with a date of discovery on or about July 27, 2017, in and triable in the State of Colorado, SONYA D. CAMARCO, unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money, of Deborah Lynn DeSantis, Lucas DeSantis, and Raquel DeSantis, without authorization, or by threat or deception, and did knowingly use, conceal or abandon the money in such a manner as to permanently deprive Deborah Lynn DeSantis, Lucas DeSantis, and Raquel DeSantis of its use or benefit; and the value of said money was one hundred thousand dollars or more but less than one million dollars, in violation of section 18-4-401(1)(b),(2)(i), C.R.S.

The facts supporting Counts Four through Six include, but are not limited to, the following:

10. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Four through Six by this reference.
11. Deborah Lynn DeSantis (“DeSantis”) was a client of LPL. DeSantis’ husband is Perry DeSantis. Deborah has two children, Raquel DeSantis and Lucas DeSantis. DeSantis holds accounts at LPL in her own name and joint

accounts with her children. DeSantis was always the primary contact person for all accounts. Whenever communication about LPL accounts was required, Camarco contacted DeSantis and no other family members. DeSantis and Camarco were friends. Camarco provided regular updates on the status of securities during quarterly telephone calls. Occasionally they would meet for updates or to have documents signed at DeSantis' house in Littleton, Colorado.

12. Camarco served as a financial advisor and brokerage account executive for DeSantis. DeSantis relied upon the advice and guidance of Camarco. DeSantis was generally unsophisticated on investment related topics and trusted Camarco to act in her best interest to obtain profits from her investments. Camarco provided advice and executed trades on DeSantis' behalf. Camarco maintained regular contact with DeSantis. Camarco had authorization from DeSantis to effect purchases and sales of investment products without prior authorization. Despite this, it was Camarco's practice to regularly alert DeSantis prior to conducting a transaction on her behalf. DeSantis did not agree to make any investments away from LPL. DeSantis received trade confirmations and monthly LPL statements related to her accounts.
13. An LPL investigator contacted DeSantis in August of 2017 regarding third-party checks drawn on her account and made payable to "C Investments." At no time prior to this call had DeSantis ever heard of or been made aware of "C Investments" or "Camarco Investments." DeSantis reviewed her accounts and identified third-party checks that were issued from her account to an entity called "C Investments". Camarco did not express to DeSantis that she was affiliated with "C Investments" in any way. Camarco did not provide any information regarding "Camarco Investments" to DeSantis.
14. Eleven third-party checks dated November 4, 2013 through November 15, 2016 were drawn on DeSantis' account at LPL and made payable to "C Investments" without the authorization of DeSantis. These checks totaled \$147,672.38 and were mailed to 10940 S. Parker Road, #518, Parker, Colorado. Three third-party checks dated March 28, 2013 through January 19, 2015 were drawn on Lucas DeSantis' account at LPL and made payable to "C Investments" without the authorization of DeSantis or Lucas DeSantis and mailed to 10940 S. Parker Road, #518, Parker, Colorado. These checks total \$48,660.07. Finally, seven third-party checks dated December 8, 2013 through February 18, 2015 were drawn on Raquel DeSantis' account at LPL and made payable to "C Investments" without the authorization of DeSantis or Raquel DeSantis and mailed to 10940 S. Parker Road, #518, Parker,

Colorado. These checks total \$80,181.16. Some of the above described checks were deposited at the First Bank branch location at 1010 W. Baptist Road, Colorado Springs, Colorado.

15. On several occasions, DeSantis reviewed accounts statements and observed entries for third party checks. DeSantis emailed Camarco about these transaction and in some cases received no response and in other situations received a response that misrepresented where the funds were directed.

### **COUNT SEVEN**

(Securities Fraud – F3)

C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1) {as to Kathleen Gentry}

On or about July 8, 2013, in and triable in the State of Colorado, SONYA D. CAMARCO, in connection with the offer or sale of any security, directly or indirectly, unlawfully, feloniously, and willfully engaged in any act, practice, or course of business which operated or would have operated as fraud or deceit upon investors, including Kathleen Gentry, contrary to the form of the statutes in such case made and provided, C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1), and against the peace and dignity of the People of the State of Colorado.

### **COUNT EIGHT:**

(Theft - \$5,000-\$20,000 – F5)

C.R.S. § 18-4-401(1),(2)(g)

{As to Kathleen Gentry}

On or about July 8, 2013, in and triable in the State of Colorado, with a date of discovery on or about July 27, 2017, SONYA D. CAMARCO, unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money, of Kathleen Gentry, without authorization, or by threat or deception, and did knowingly use, conceal or abandon the money in such a manner as to permanently deprive Kathleen Gentry of its use or benefit; and the value of said money was five thousand dollars or more but less than twenty thousand dollars, in violation of section 18-4-401(1)(b),(2)(g) C.R.S.

The facts supporting Counts Seven and Eight include, but are not limited to, the following:

16. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Seven and Eight by this reference.

17. Kathleen Gentry ("Gentry") was a client of LPL and held multiple investments. Gentry had a home in Crested Butte, Colorado. Gentry was generally inactive in terms of managing her investments with LPL. Camarco inherited the Gentry account from another LPL agent in approximately 2010. Gentry met Camarco for the first time at a political fundraiser. They would also meet in person occasionally when Camarco visited Crested Butte, Colorado. Generally, very little communication occurred between Gentry and Camarco about Gentry's investments.
18. Gentry received account statements and trade confirmations from LPL. Gentry did not understand much of the content of these documents.
19. Camarco reached out to Gentry in 2013 by phone to discuss an investment opportunity for Gentry. Camarco provided no details about the investment. Gentry trusted Camarco and felt fortunate that Camarco had approached her about the opportunity. No specific amount for the investment was mentioned by Camarco. Camarco simply represented to Gentry that she had a great investment opportunity for her but that it would require that Gentry give Camarco money from one of Gentry's LPL securities accounts which Camarco would then invest in the opportunity. Camarco only discussed this investment opportunity one time. Gentry never received any follow up information or updates from Camarco about this purported investment. Gentry approved the investment despite the limited information provided.
20. A third-party check drawn on Gentry's LPL account dated July 8, 2013 for \$19,436.43 and made payable to "C Investments" was mailed to 10940 S. Parker Road, #518, Parker, Colorado. The check was issued without Gentry's express authorization. Camarco sold 1480 shares owned by Gentry of the "MFS Emerging Market Debt" mutual fund in order to generate the funds necessary to cover the "C Investments" check.
21. Gentry reviewed a document titled "Third Party Check" that purported to authorize the July 8, 2013 check to "C Investments." The document appears to bear the signature of Gentry above the words "Account Holder Signature" authorizing a check to be issued to "C Investments." In general, this document authorizes a check drawn on the account of the investor to be issued to a third party. Gentry reviewed this document and affirmed that she did not sign this document or authorize this signature to be placed on the document.

22. Gentry was not informed that Camarco would be transferring funds ultimately to personal accounts and use her funds for non-investment related expenditures or for her own benefit.

**COUNT NINE:**

(Securities Fraud – F3)

C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1) {as to Elizabeth Lautman}

On and between July 19, 2015 and September 27, 2016, in and triable in the State of Colorado, SONYA D. CAMARCO, in connection with the offer or sale of any security, directly or indirectly, unlawfully, feloniously, and willfully engaged in any act, practice, or course of business which operated or would have operated as fraud or deceit upon investors, including Elizabeth Lautman, contrary to the form of the statutes in such case made and provided, C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1), and against the peace and dignity of the People of the State of Colorado.

**COUNT TEN:**

(Theft - \$100,000 - \$1,000,000 – F3)

C.R.S. § 18-4-401(1),(2)(i)

{As to Elizabeth Lautman}

On and between July 19, 2015 and September 27, 2016, in and triable in the State of Colorado, SONYA D. CAMARCO, unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money, of Elizabeth Lautman, without authorization, or by threat or deception, and did knowingly use, conceal or abandon the money in such a manner as to permanently deprive Elizabeth Lautman of its use or benefit; and the value of said money was one hundred thousand dollars or more but less than one million dollars, in violation of section 18-4-401(1)(b),(2)(i), C.R.S.

The facts supporting Counts Nine and Ten include, but are not limited to, the following:

23. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Nine and Ten by this reference.
24. Elizabeth Lautman was a client of LPL. She held accounts in her own name and through a living trust established for her benefit. Camarco served as a financial advisor and brokerage account executive for Elizabeth Lautman. She provided advice and executed trades on her behalf. Camarco maintained

regular contact with Elizabeth Lautman. Generally, Camarco communicated with Elizabeth Lautman every quarter. Elizabeth Lautman would also receive regular account statements from LPL.

25. Camarco was not an authorized signatory on any of Elizabeth Lautman's accounts at LPL.
26. On occasion, Elizabeth Lautman observed unexpected drops in her account balances at LPL. Elizabeth Lautman questioned Camarco about these drops and Camarco suggested that Elizabeth Lautman should work more because Lautman was spending more money than she earned.
27. Elizabeth Lautman reviewed her accounts and discovered a third-party check that was issued from her account to an entity called "C Investments." Elizabeth Lautman questioned Camarco about this. Camarco responded that "C Investments" was a type of outside investment that she had made on Lautman's behalf. Camarco did not express to Elizabeth Lautman that she was affiliated with "C Investments" in any way. Camarco did not provide any information regarding "Camarco Investments" to Elizabeth Lautman.
28. Elizabeth Lautman reviewed her accounts and identified several third-party checks that were issued to "C Investments" and drawn on Elizabeth Lautman's accounts at LPL that she did not authorize. Twelve third-party checks dated July 19, 2015 through September 27, 2016 were drawn on Elizabeth Lautman's accounts at LPL and made payable to "C Investments" without the authorization of Elizabeth Lautman.

**COUNT ELEVEN:**

(Securities Fraud – F3)

C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1) {as to Jo-Ann Lautman}

On and between April 28, 2016 and May 28, 2017, in and triable in the State of Colorado, SONYA D. CAMARCO, in connection with the offer or sale of any security, directly or indirectly, unlawfully, feloniously, and willfully engaged in any act, practice or course of business which operated or would have operated as fraud or deceit upon investors, including Jo-Ann Lautman, contrary to the form of the statutes in such case made and provided, C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1), and against the peace and dignity of the People of the State of Colorado.

**COUNT TWELVE:**  
(Theft - \$100,000 - \$1,000,000 – F3)  
C.R.S. § 18-4-401(1),(2)(i)  
{As to Jo-Ann Lautman}

On and between April 28, 2016 and May 28, 2017, in and triable in the State of Colorado, SONYA D. CAMARCO, unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money, of Jo-Ann Lautman, without authorization, or by threat or deception, and did knowingly use, conceal or abandon the money in such a manner as to permanently deprive Jo-Ann Lautman of its use or benefit; and the value of said money was one hundred thousand dollars or more but less than one million dollars, in violation of section 18-4-401(1)(b),(2)(i), C.R.S.

The facts supporting Counts Eleven and Twelve include, but are not limited to, the following:

29. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Eleven and Twelve by this reference.
30. Joanne Lautman was a client of LPL. She held accounts in her own name and through a living trust established for her benefit and for her late husband. Camarco served as a financial advisor and brokerage account executive for Jo-Ann Lautman. Camarco provided advice and executed trades on her behalf. Camarco maintained regular contact with Jo-Ann Lautman. Generally, Camarco communicated with Jo-Ann Lautman quarterly. Jo-Ann Lautman would also receive monthly account statements from LPL.
31. Camarco was not an authorized signatory on any of Jo-Ann Lautman's accounts at LPL.
32. An LPL investigator contacted Jo-Ann Lautman regarding a third-party check they had identified which was drawn on her account and made payable to "C Investments." At no time prior to this call had Jo-Ann Lautman ever heard of or been made aware of "C Investments" or "Camarco Investments."
33. Jo-Ann Lautman reviewed her accounts and identified several third-party checks that were issued to "C Investments" and drawn on Jo-Ann Lautman's accounts at LPL that she did not authorize. Eight third-party checks dated April 28, 2016 through May 28, 2017 totaling \$394,092.97 were drawn on Jo-

Ann Lautman's accounts at LPL and made payable to "C Investments" without the authorization of Jo-Ann Lautman. The checks were mailed to 10940 S. Parker Road, #518, Parker, Colorado.

34. Jo-Ann Lautman reviewed a document entitled, "Check to a Third Party of Alternate Address," that was provided to her by an LPL investigator and which appears to bear the signature of Jo-Ann Lautman above the words "Account Holder Signature" purporting to authorize a check to be issued to "C Investments." In general, this document authorizes a check drawn on the account of the investor to be issued to a third party. Jo-Ann Lautman reviewed this document and affirmed that she did not sign this document or authorize this signature to be placed on the document.

**COUNT THIRTEEN:**

(Securities Fraud – F3)

C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1) {as to Pamela Desmond, Keith J. Robertson, Kellye Robertson, and Marjorie Wilson Symonds}

On and between February 27, 2013 and August 24, 2015, in and triable in the State of Colorado, SONYA D. CAMARCO, in connection with the offer or sale of any security, directly or indirectly, unlawfully, feloniously, and willfully engaged in any act, practice, or course of business which operated or would have operated as fraud or deceit upon investors, including Pamela Desmond, Keith J. Robertson, Kellye Robertson, and Marjorie Wilson Symonds contrary to the form of the statutes in such case made and provided, C.R.S. §§ 11-51-501(1)(c) and 11-51-603(1), and against the peace and dignity of the People of the State of Colorado.

The facts supporting Counts Thirteen include, but are not limited to, the following:

35. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Thirteen through Fifteen by this reference.
36. Pamela Desmond, Keith J. Robertson, Kellye Robertson and Marjorie Wilson Symonds were clients of LPL. Camarco was the account representative to each individual.
37. A third-party check was drawn on Pamela Desmond's LPL account dated February 27, 2013 for \$40,224.00 made payable to "C Investments" and was mailed to 10940 S. Parker Road, #518, Parker, Colorado.

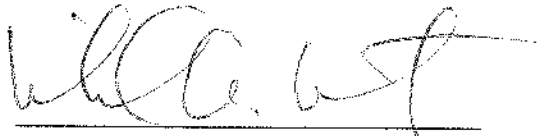


38. A third-party check was drawn on Keith Robertson's LPL account dated August 9, 2015 for \$1,987.19 made payable to "C Investments" and was mailed to 10940 S. Parker Road, #518, Parker, Colorado.
39. A third-party check was drawn on Kellye Robertson's LPL account dated August 9, 2015 for \$1,986.19 made payable to "C Investments" and was mailed to 10940 S. Parker Road, #518, Parker, Colorado.
40. Two third-party checks were drawn on Marjorie Wilson Symonds' LPL account. The checks were dated March 20, 2013 for \$13,765.26 and on May 9, 2013 for \$21,491.25. Both checks were made payable to "C Investments" and were mailed to 10940 S. Parker Road, #518, Parker, Colorado.

The 2017 - 2018 State Grand Jury presents the within Indictment, and the same is hereby

Ordered filed this 21<sup>st</sup> day of September, 2017.

Pursuant to C.R.S. 13-73-107, the Court hereby designates the County of Douglas, Colorado, as the county of venue for the purposes of trial.



MICHAEL A. MARTINEZ  
Chief Judge, Second Judicial District