

YOUR AFFIANT SAYS THAT THE FACTS IN SUPPORT OF THE ISSUANCE OF THE ARREST WARRANT ARE AS FOLLOWS:

I, Mike Reilly, your Affiant, being first duly sworn, hereby declare, upon information and belief:

STATEMENT OF EXPERIENCE

I am an Inspector with the Bureau of Investigations at the San Francisco District Attorney's Office ("SFDA"). I have been employed by the SFDA since May 15th, 2023. Prior to this I was employed by the Alameda County District Attorney's Office (ACDA) as an Inspector II from February of 2018 to May of 2023. While at the ACDA, I was assigned to the Special Operations Unit's (SOU) Public Integrity Unit. Before working at the Alameda County District Attorney's Office, I was employed by the Oakland Police Department from November 1988 to February 2018. While at the Oakland Police Department I worked as a Patrol Officer, Special Duty Unit Officer, SWAT Team Operator, Narcotics Section Investigator, Criminal Investigations Sergeant, SWAT Team Leader, Patrol Supervisor, Crime Reduction Team Supervisor, Intelligence Division Supervisor, Patrol Watch Commander, Special Resources Section Commander, and SWAT Commander.

I have developed numerous professional contacts and have interviewed persons who were involved in or admitted to committing various crimes, including but not limited to murders, violent assaults, sexual assaults, robberies, public corruption, and property crimes. I have investigated such crimes within the City of Oakland, the County of Alameda, and the City and County of San Francisco, and I am familiar with the many methods by which these crimes are committed, and the various types of evidence that might be associated with these crimes.

I possess the Basic, Intermediate, and Advanced California Peace Officer Standards and Training Certificates as a Police Officer. I have also received training in the preparation and execution of search warrants as they pertain to various criminal investigations and have received specialized training in the investigation of violent crimes and other criminal investigations, to include crimes related to public corruption.

I am currently part of the SFDA's Public Integrity Task Force which investigates public corruption in the City and County of San Francisco.

INTRODUCTION

This current investigation began when your affiant noticed unusual banking activity in records obtained as part of a separate investigation. In January of 2024, the San Francisco District Attorney's Office charged STANLEY ELLICOTT, a high-level manager at the City's Department of Human Resources, with crimes for participating in a scheme involving conflicts of interest in contracts and grants awarded through the City Administrator's Office's Community Challenge Grant Program and the misappropriation of City funds in connection with that program. (See *People v. Stanley Ellicott*, Court No. 24001435.) ELLICOTT's case was shortly thereafter joined with a previously charged case against his co-defendants Lanita Henriquez, a former employee of the City Administrator's Office, and Rudolph Dwayne Jones, a local

businessman with connections to City government. (See People v. Lanita Henriquez, Court No. 23013637; People v. Rudolph Dwayne Jones, Court No. 23013720.)

In the already-charged case, ELLICOTT received nearly \$270,000 in connection with the City grants, at least \$65,000 of which he kicked back to Henriquez, the employee who entered into the grant contracts on behalf of the City. His payments were in the form of checks that were deposited into two different bank accounts, the records of which your affiant received pursuant to search warrants. A review of one of ELLICOTT's personal bank accounts revealed a years-long series of unusual deposits labeled "bill pmt" from someone hereinafter referred to as "Witness 1" – more than \$450,000 in total. These payments triggered a separate investigation into their source.

I located Witness 1, who lives in Chicago, and she told me that ELLICOTT paid her \$1,000 in 2019 to set up a business called IAG Services and to set up a bank account using that company name and her own information. Witness 1 said ELLICOTT then took control of the account. Witness 1 provided copies of two checks she received at a post office box ELLICOTT asked her to set up that were to be deposited into the account; they were from the City and County of San Francisco's Department of Human Resources Workers' Compensation Division – the department where ELLICOTT worked – payable to IAG Services for \$18,500 total. These checks were dated May and June of 2019.

According to the City's Human Resources Department, their records show more than \$627,000 in payments from the City to "IAG Services." Managers at the Human Resources Department confirmed that IAG Services was added as a vendor into the City's system in May of 2019 by ELLICOTT. They also explained that these payments, which started in May of 2019 and continued through January 10, 2024, appeared to be fraudulent payments related to otherwise legitimate workers' compensation claims.

RELEVANT LAW

Cal. Penal Code § 186.10 (money laundering)

Any person who conducts or attempts to conduct a transaction or more than one transaction within a seven-day period involving a monetary instrument or instruments of a total value exceeding five thousand dollars (\$5,000), or a total value exceeding twenty-five thousand dollars (\$25,000) within a 30-day period, through one or more financial institutions (1) with the specific intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment or carrying on of any criminal activity, or (2) knowing that the monetary instrument represents the proceeds of, or is derived directly or indirectly from the proceeds of, criminal activity is guilty of the crime of money laundering.

Cal. Penal Code § 424 (misappropriation of public moneys)

(a) Each officer of this state, or of any county, city, town, or district of this state, and every other person charged with the receipt, safekeeping, transfer, or disbursement of public moneys, who either:

1. Without authority of law, appropriates the same, or any portion thereof, to his or her own use, or to the use of another; or,
2. Loans the same or any portion thereof; makes any profit out of, or uses the same for any purpose not authorized by law; or,

3. Knowingly keeps any false account, or makes any false entry or erasure in any account of or relating to the same; or,
4. Fraudulently alters, falsifies, conceals, destroys, or obliterates any account; or,
5. Willfully refuses or omits to pay over, on demand, any public moneys in his or her hands, upon the presentation of a draft, order, or warrant drawn upon these moneys by competent authority; or,
6. Willfully omits to transfer the same, when transfer is required by law; or,
7. Willfully omits or refuses to pay over to any officer or person authorized by law to receive the same, any money received by him or her under any duty imposed by law so to pay over the same;—

Is punishable by imprisonment in the state prison for two, three, or four years, and is disqualified from holding any office in this state.

(b) As used in this section, “public moneys” includes the proceeds derived from the sale of bonds or other evidence or indebtedness authorized by the legislative body of any city, county, district, or public agency.

Cal. Penal Code § 487 (grand theft)

Grand theft is theft committed in any of the following cases:

(a) When the money, labor, real property, or personal property taken is of a value exceeding nine hundred fifty dollars (\$950), except as provided in subdivision (b).

Cal. Penal Code § 550(a) (insurance fraud)

(a) It is unlawful to do any of the following, or to aid, abet, solicit, or conspire with any person to do any of the following:

(5) Knowingly prepare, make, or subscribe any writing, with the intent to present or use it, or to allow it to be presented, in support of any false or fraudulent claim.

DISCOVERY OF INFORMATION

In December 2023, pursuant to a search warrant written by your affiant, Ally Bank and the San Francisco Fire Credit Union produced bank records for ELLICOTT related to his role in the Jones and Henriquez fraud and theft. A review of the financial records from Ally Bank showed deposits into this account from Witness 1 totaling over \$450,000 over a four-year period. On January 25, 2024, your affiant received copies of checks from Witness 1 payable to IAG Services from the City and County of San Francisco Human Resources Department’s Workers’ Compensation Division. On January 26, 2024, the director of the San Francisco Human Resources Department told your affiant there was no legitimate reason why an employee of her department would be in possession of City checks from the department payable to a third party.

A. INVOLVED INDIVIDUAL

Stanley Ellicott

ELLICOTT was employed by the City and County of San Francisco in various departments from 2012 to 2015. He left, then was rehired in November of 2016. He became a manager (job code 0931) in the Department of Human Resources in July of 2017.

His most recent job at the Department of Human Resources was as the Assistant Director of Finance and Technology. According to the recent job posting for the position, which recently became vacant when ELLICOTT was placed on leave after he was arrested on January 25, 2024, “[a]bove all, the Assistant Director of Finance and Technology is responsible for the financial integrity of the Workers’ Compensation Division.” ELLICOTT oversaw bill payment operations for the workers’ compensation program. He also oversaw the technological interfaces with the electronic claims system.

B. INVESTIGATION

IAG Services and Axos Bank

A review of the financial statements from Ally Bank revealed a series of deposits into ELLICOTT’s account from Witness 1. Your affiant identified Witness 1 and contacted her after ELLICOTT’s arrest on January 25, 2024, in relation to crimes charged in court number 24001435.

Witness 1 explained that she and ELLICOTT were friends in college and that ELLICOTT asked that she set up a company in her name for his use. ELLICOTT explained that he needed this due to a conflict-of-interest concern. She recalled the name of the company was IAG Services. In addition to the company, ELLICOTT asked Witness 1 to set up a bank account in her name which she did at Axos Bank. For these services ELLICOTT paid her \$1,000.00.

Witness 1 stated that she received statements and correspondence from the bank via email which she forwarded to ELLICOTT. She stated that she never accessed the account, or had access to the account, after she provided ELLICOTT with the access information¹. She stated that she never sent money to ELLICOTT from this account and that she never put money into the account. After receiving bank statements from Axos Bank and associated documents, your affiant noted a \$1,000.00 deposit into the Axos account when it was opened in 2019. The deposit was from a Bank of America account which appeared to be associated with Witness 1. I contacted Witness 1 again after learning this information. Witness 1 confirmed that the last four digits of the Bank of America account from which the \$1,000.00 was deposited is consistent with her Bank of America account but does not remember making the deposit.

Witness 1 provided your affiant documents she used to register IAG Services. These included an Assumed Name Certificate dated April 30, 2019, an Employer Identification Number (EIN) provided by the IRS on March 28, 2019, and Registering a Business Name from Cook County, Illinois, dated April 30, 2019.

Additionally, Witness 1 provided screen shots of email correspondence from Axos Bank to Witness 1 and an email from Witness 1 to ELLICOTT, providing him with the access information for the account dated July 8, 2019. The second screen shot depicted email correspondence from Axos Bank to Witness 1 confirming a deposit of \$9,250.00 on July 11, 2019, and an email forwarding this information to ELLICOTT. The third screen shot depicted

¹ The Axos Bank records contain a log of all IP addresses that accessed the account. A crime analyst in the San Francisco District Attorney’s Office did a Cell Hawk search for the three IP addresses; two were in Berkeley, CA (Ellicott’s address is in Oakland, less than three miles from Berkeley) and the third is in Fort Bragg, CA (the location of Ellicott’s second home). The account was never accessed from Illinois (where Witness 1 lives and where IAG Services was registered)

email correspondence from Axos Bank to Witness 1 confirming a deposit of \$9,250 on July 14, 2019, and an email forwarding this information to ELLICOTT.

Witness 1 also provided a copy of check # 0001031345 for \$9,250 from the City and County of San Francisco, Dept of Human Resources, Workers' Comp Division dated May 29, 2019, made out to IAG Services. Attached to the check are 10 workers' comp claimants, with associated claim numbers, each for \$925.00.

Witness 1 provided a copy of a second check, # 0001031742, for \$9,250 from the City and County of San Francisco, Dept of Human Resources, Workers' Comp Division dated 06/04/2019 made out to IAG Services. Attached to the check are 10 workers' comp claimants, with associated claim numbers, each for \$925.00.

Witness 1 advised that both checks arrived at the PO Box she set up for IAG Services at ELLICOTT's direction. Witness 1 made copies of both checks before giving the originals to ELLICOTT during a planned visit to see him.

Witness 1 also provided screen shots of email correspondence from Axos Bank entitled, "Axos Bank Bill Pay-e Plus." These emails are related to employee payments and direct deposit activity. In each screen shot, Witness 1 forwards the email from Axos Bank to ELLICOTT. Witness 1 also provided the PDF confirmations from Axos Bank. The dates for this activity Witness 1 forwarded were June 15, 2020, July 1, 2020, December 1, 2023, December 15, 2023, and December 19, 2023.

IAG Services Website

Records provided by the Department of Human Resources show that in the vendor profile for IAG Services, an email of megan@independentauditorsgroup.com is listed. Your affiant and a crime analyst in the District Attorney's Office visited the website independentauditorsgroup.com after seeing that email address and noted it is a minimal website with only a few pages and links that appears like a professional website. The crime analyst was able to determine that the site was created in Oakland, California, the city in which ELLICOTT lives. The documentation provided by Witness 1 related to the creation of IAG Services as a business entity originates in Cook County, Illinois with listed business addresses in Chicago, Illinois. In addition to the email address megan@independentauditorsgroup.com, the IAG Services website also lists the email address louise@independentauditorsgroup.com and inquiries@independentauditorsgroup.com. The site lists "Megan Klint" as the "Director of Assurance Services" and "Louise McFadden" as the "Director of Advisory & Accounting Services."

Your affiant conducted an internet check of the domain name used by IAG Services, [@independentauditorsgroup.com](http://independentauditorsgroup.com). Your affiant learned that the domain name [@independentauditorsgroup.com](http://independentauditorsgroup.com) is hosted by Google LLC. Your affiant sought a search warrant for these email addresses, which the court granted. The records have yet to be received.

Pursuant to a search warrant, the Department of Information Technology for the City and County of San Francisco provided your affiant with ELLICOTT's work emails involving correspondence with IAG Services. Your affiant located emails from "Megan Klint" to ELLICOTT from as early as February of 2019 – the month before ELLICOTT directed and paid Witness 1 to register the business IAG Services. The email accounts used by "Megan Klint" were megan@independentauditorsgroup.com and inquiries@independentauditorsgroup.com.

The emails document ELLICOTT's work to onboard IAG Services as a vendor to the City and County of San Francisco Workers' Compensation Division – where ELLICOTT was a manager – to “provide claim financial services.” Interestingly, in one of the emails from “Megan Klint,” her name is signed “Megan Clint.”

Human Resources Department

Your affiant spoke to the Director of Human Resources for the City and County of San Francisco (“the director”). The director advised that there was no explainable reason related to his job why ELLICOTT would be receiving checks from the City's Workers' Comp division related to worker claims that were payable to an outside company.

Your affiant spoke to the director again on January 31, 2024, in a meeting over Microsoft Teams with an attorney from the San Francisco District Attorney's Office's Special Prosecutions Unit and two other high-level managers in the Department of Human Resources. They explained that their systems show payments totaling approximately \$627,000 from the City to the vendor IAG Services. They explained that they can see from their records system that IAG Services was added as an approved City vendor in May of 2019 by ELLICOTT.

The director and her colleagues said the \$627,000 paid out to IAG Services appeared to be fraudulent payments related to legitimate workers' compensation insurance claims. San Francisco is self-insured for workers' compensation services, therefore, all payments for workers' compensation claims are made with city money. They said the first payments were by check in May and June of 2019 – which appear to correspond to the checks Witness 1 provided – but then the system converted to Electronic Fund Transfer (EFT) payments beginning in August of 2019. They said the most recent payment from the City to IAG Services was on January 10, 2024.

The director's colleague said he discovered, as he looked into the IAG Services payments once they were brought to his attention last week, there was scant documentation that they payments were supposed to be for auditing services. He said he also noticed that in their electronic system, a box was checked so that 1099 independent contractor tax would not be issued to IAG Services as a vendor. He said this was highly unusual, as the City should issue a 1099 for all vendors that do more than \$600 in business with the City.

In an interview on March 15, 2024, a high-level manager at the Human Resources Department explained that he would expect to see “deliverables,” such as an actual report of an audit explaining findings and recommendations, if this work had actually been done. He explained that for other vendors, he sees such reports in the department's records. However, none exist for IAG Services.

The manager also explained that there should be an invoice to back up all payments. He said he located some IAG Services invoices in a shared drive location where they should be. He said he also located some in ELLICOTT's emails. He said that while their records show an invoice number associated with each payment, he was unable to locate actual invoices for most of the payments made to IAG Services. He provided your affiant with invoices he did locate. Some are stamped “approved” and are signed by ELLICOTT. Others are stamped “approved” and appear to be electronically signed by ELLICOTT.

The manager provided business records from the department's claims system showing all records of payments to IAG Services. He explained that there were 643 workers' compensation claims in the system with IAG Services billing – almost all of them billed just once for an amount between \$925 and \$986 – with only a handful that were ever billed twice. He explained that the first 139 claims for which IAG Services was paid were billed individually. After that, each billing was done as a "bulk payment" with one payment generated that was spread across multiple claims. According to the records provided, the total amount paid to IAG Services was \$627,118.86.

Finally, the manager explained that it was part of ELLICOTT's job to approve payments. He could process the payments himself, or he could delegate payment processing to people who worked for him. Department records show that some of the IAG Services payments were initiated by ELLICOTT himself, some by a system user "CCSFPROD," which was unusual, and some by employees who worked for ELLICOTT. Email records support this; the City's Department of Technology provided your affiant with several emails in which ELLICOTT attached an invoice, sometimes forwarding an email from "Megan Klint," in a message to one of the other employees, telling them he approved the payment and requesting they process it.

C. PAYMENTS FROM IAG SERVICES TO ELLICOTT

A review of the records provided by Ally bank show that in August of 2019, shortly after ELLICOTT asked Witness 1 to set up the business and the bank account, four separate deposits were made into ELLICOTT's Ally account totaling \$18,000 with a notation that states "Direct Deposit [WITNESS 1] D BILL PMT BILL PMT." The deposits were as follows:

- \$4,000 on August 6, 2019
- \$5,500 on August 7, 2019
- \$4,250 on August 15, 2019
- \$4,250 on August 29, 2019

Thereafter, for the months of September, October, and November of 2019, a deposit in the amount of \$4,250 with same notation appears every two weeks in ELLICOTT's Ally account, for a total of six payments in the amount of \$25,500.

The bimonthly payments began again on June 16, 2020, with a total of 12 payments deposited every two weeks until December 2, 2020 with the notation "Direct Deposit [WITNESS 1] D BILL PMT BILL PMT." These payments were each for \$4,288 for a total of \$51,456.

After a few months off, the deposits resumed on April 21, 2021 and continued, every two weeks, until February 7, 2022. These payments started off at \$4,109.70, then increased to \$6,842.18 beginning on July 6, 2021. The total payments received with the notation "Direct Deposit [WITNESS 1] D BILL PMT BILL PMT" in this time period was \$123,181.20.

ELLICOTT's Ally account received no such payments in March and April of 2022, then received one payment each month for May, June, and July of 2022 in the amounts of \$8,329, \$8,014, and \$8,217 with the notation "Direct Deposit [WITNESS 1] D BILL PMT BILL PMT." Those three deposits totaled \$24,560.

The deposits continued at an every-two-weeks pace beginning on August 2, 2022 until the last payment on August 16, 2023. These payments were for \$8,217 through November of 2022, then \$7,146 from December 2, 2022 through April 3, 2023, and then \$8,632.45 every two weeks until the payments ended. It should be noted that ELLICOTT's co-defendant in a separate theft-of-public-money case, Lanita Henriquez, was arrested in that case on August 29, 2023, just a day

before what would have been the next bi-monthly payment, had the deposits not ceased. This last year's worth of payments every two weeks totaled \$207,742.05.

In total, ELLICOTT's Ally bank account received 71 deposits between August 6, 2019 and August 16, 2023 for a total of \$450,439.25 with the notation "Direct Deposit [WITNESS 1] D BILL PMT BILL PMT."

A review of bank statements produced by Axos Bank, pursuant to a search warrant, show transactions to ELLICOTT labeled, "Bill Paid-STAN ELLICOTT", from the IAG account at Axos Bank, in the amounts that correspond with the deposits described above into ELLICOTT's personal Ally Bank account, totaling \$450,439.25.

The payments to ELLICOTT's Ally Bank account end after August of 2023. However, on November 30, 2023, as well as on December 14, 2023, January 4, 2024, January 18, 2024, and February 2, 2024, payments appear on IAG's Axos bank statements labelled "payroll." The November "payroll" payment is for \$6,418, and the other payments are all for \$7,819.22. IAG's Axos bank records show that these payments were for an "employee" named, "STAN ELLICOTT" and were sent to an account at Green Dot bank. The email address associated with the "employee" was [REDACTED].

Your affiant is aware that Proton Mail, unlike Gmail or Outlook, stores user's emails and communications in an encrypted format making it impossible to read by third parties such as law enforcement. Additionally, Proton Mail's servers are located in Switzerland and not subject to subpoena or search warrant services from United States law enforcement agencies. Your affiant is also aware that Green Dot Bank is a bank favored by those wishing to conceal their financial identities as the bank does not use traditional account structures but specializes in pre-paid cards that can be loaded in a variety of ways – including anonymously in the case of cash.

In total, between the Ally and Green Dot accounts, \$488,134.13 was transferred from IAG's Axos account into accounts belonging to ELLICOTT.

D. ELLICOTT'S ACTIONS TO EVADE DETECTION AND DESTROY EVIDENCE; ELLICOTT'S ARREST

On August 29, 2023, Lanita Henriquez, one of ELLICOTT's co-defendants in his charged case, was arrested. Several news outlets reported her arrest and her scheme with Rudolph Dwayne Jones to take public funds through the Community Challenge Grant Program and have a financial interest in government contracts. Your affiant did not know ELLICOTT's role in these crimes at the time; he was not arrested and charged with Henriquez and Jones in August.

However, on September 6, 2023, according to records from Google, someone deleted an email account (ccgsfgov@gmail.com) that was used for communications related to Henriquez's crimes. Your affiant's office was able to obtain the messages and records from this email account through a search warrant in November of 2023 because we had requested its preservation at the time of Henriquez's arrest. A subsequent search of this email account showed ELLICOTT accessed the account both for personal shopping purposes and for communication with Henriquez about the Community Challenge Grants. According to Google records, this email account was last accessed by someone in Fort Bragg, California, where ELLICOTT owned a

second home at the time. Further, per Google, the recovery email for the account was [REDACTED]

In September of 2023, payments to ELLICOTT from IAG's Axos Bank account ceased. Similar payments began again in November of 2023, however these payments were then labeled, "Payroll" and were no longer deposited into ELLICOTT's Ally Bank account but into another financial institution. Axos records show the "payroll" was for an employee named Stan ELLICOTT, and the payments went into a Green Dot account.

On October 12, 2023, ELLICOTT moved \$9,999.99 from his account at the San Francisco Fire Credit Union – the account where he deposited most of the checks he received from JONES in connection with the Community Challenge Grant scheme – into a new bank account at a different institution. On October 17, 2023, he moved \$3,000 from the Credit Union account to the new account. In November he transferred the remaining balance out of the Credit Union Account.

Throughout December of 2023 and January of 2024 your affiant and members of the San Francisco District Attorney's Office's Public Integrity Task Force continued to investigate ELLICOTT's role in the Henriquez and Jones misappropriation of public funds and financial conflicts of interest. On January 19, 2024, the Honorable Judge Lynda Colfax signed an arrest warrant for ELLICOTT for the following felony charges:

- Penal Code Section 424(a)(1), misappropriation of public money
- Government Code Section 1090(b), aiding and abetting a financial conflict of interest in government contracts
- Penal Code Section 496, receipt of stolen property

On January 25, 2024, your affiant arrested ELLICOTT at the offices of the Department of Human Resources for the City and County of San Francisco. ELLICOTT was booked into the county jail.

Witness 1 told your affiant on January 31, 2024, she received a text message from ELLICOTT on January 25, 2024, the day he was arrested, to which she did not respond. She said she later noticed that all of their past text messages, prior to January 2024, which were in a thread that dated back years, were all inexplicably missing. The only messages that remained in her correspondence with ELLICOTT were those from January 2024. Witness 1 advised that other text threads on her phone were not so affected.

FINDINGS

Based on the information in this affidavit and based upon my training and experience, it appears that there is reasonable and probable cause to believe that ELLICOTT committed violations of the following felony crimes:

- Penal Code Section 487, grand theft
- Penal Code Section 424, misappropriation of public money
- Penal Code Section 550(a)(5), insurance fraud
- Penal Code Section 186.10, money laundering

REQUEST FOR ARREST WARRANT

Based on the information and based upon my training and experience, it appears that there is reasonable and probable cause to believe that ELLICOTT committed violations of the following felony crimes:

- Penal Code section 487, grand theft;
- Penal Code section 424, misappropriation of public money;
- 10 violations of Penal Code section 550(a)(5) for each date in which ELLICOTT made writings with the intent to present them in support of a fraudulent insurance claim as follow:
 1. February 27, 2019-May 15, 2019: series of emails back and forth between megan@internationalauditorsgroup.com and ELLICOTT's work email containing written proposals and a letter of engagement;
 2. May 28, 2019: set of fraudulent invoices from IAG Services;
 3. June 8, 2020: fraudulent invoice from IAG Services;
 4. July 14, 2021: fraudulent invoice from IAG Services attached to email from ELLICOTT directing his colleagues to process payment;
 5. September 1, 2021: fraudulent invoice from IAG Services attached to email from ELLICOTT directing his colleagues to process payment;
 6. May 12, 2022: fraudulent invoice from IAG Services attached to email from ELLICOTT directing his colleagues to process payment;
 7. June 29, 2022: fraudulent invoice from IAG Services attached to email from ELLICOTT directing his colleagues to process payment;
 8. October 5, 2022: fraudulent invoice from IAG Services attached to email from ELLICOTT directing his colleagues to process payment;
 9. December 21, 2023: fraudulent invoice from IAG Services attached to email from ELLICOTT directing his colleagues to process payment;
 10. January 10, 2024: fraudulent invoice;
- 50 violations of Penal Code section 186.10, money laundering, where ELLICOTT transferred more than \$5,000 in a single transaction from the Axos account containing the stolen City funds into his personal Ally bank account;
- Penal Code section 186.11(a)(3), the aggravated white collar crime enhancement.

The District Attorney has issued, and I have signed, a Complaint charging STANLEY ELLICOTT with these offenses, and the signed Complaint is presented with this affidavit to the Court.

Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary and applicable to establish the appropriate foundation for seeking an arrest warrant. I have not purposely omitted any fact(s) that undermine or are contrary to the opinions and conclusions set forth herein.

I declare under penalty of perjury under the laws of the State of California that the entirety of the foregoing is true and correct to the best of my knowledge and belief.

WHEREFORE, your affiant requests that an arrest warrant be issued, based upon the above facts, for STANLEY ELLICOTT.

Subscribed and sworn before me on: March 19, 2024



Signature of Affiant



Signature of Magistrate

Eric R. Fleming

(Magistrate's Printed Name)

Judge of the Superior Court of California, County of San Francisco, Dept. 22