



SUPERIOR COURT OF THE STATE OF CALIFORNIA

GRAND JURY, COUNTY OF ALAMEDA

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

v.

1. ZENNEY NGUYEN,
dob [REDACTED],
2. SOURASITH SINGHARATH,
dob [REDACTED],
3. MARCUS JACKSON,
dob [REDACTED],
4. CAROLINE HAHN,
dob [REDACTED],

Defendants.

FILED
ALAMEDA COUNTY

JUN 27 2019

CLERK OF THE SUPERIOR COURT
By S. N. Bacc Deputy

19-CR-009945A
INDICTMENT

A Grand Jury of the County of Alameda, State of California, accuses the following defendants of committing, in the Counties of Alameda and Contra Costa, before the finding of this indictment, of the following crimes:

COUNT 1

ZENNEY NGUYEN and SOURASITH SINGHARATH

CONSPIRACY (Re: Fry's Electronics/Bin Y.#1)

Around September 6, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of

1 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
2 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

3 OVERT ACT 1

4 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
5 Singharath entered Fry's Electronics.

6 OVERT ACT 2

7 On September 6, 2017, in the County of Alameda, Zenney Nguyen obtained a Fry's credit
8 card with a \$6,000 limit using the personal identifying information of Bin Y.

9 OVERT ACT 3

10 On September 6, 2017, in the County of Alameda, Zenney Nguyen attempted to purchase
11 around \$5,500 worth of merchandise with the Fry's credit card obtained with Bin Y.'s personal
12 identifying information.

13 OVERT ACT 4

14 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
15 Singharath transported the personal identifying information of Bin Y.

16 COUNT 2

17 ZENNEY NGUYEN and SOURASITH SINGHARATH

18 **BURGLARY (Re: Fry's Electronics)**

19 On September 6, 2017, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
20 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
21 by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did enter a commercial building
22 occupied by Fry's Electronics with the intent to commit larceny and any felony. It is further
23 alleged that the value of the property that they took and intended to take exceeded nine hundred
24 fifty (\$950).

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1 **COUNT 3**

2 ZENNEY NGUYEN and SOURASITH SINGHARATH

3 **ATTEMPTED GRAND THEFT (Re: Fry's Electronics/Bin Y. #1)**

4 Around September 6, 2017, in the COUNTY of ALAMEDA, the crime of ATTEMPTED
5 GRAND THEFT in violation of Penal Code section 487(a) and section 664, a felony, was
6 committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did unlawfully
7 attempt to take money and personal property of another of a value exceeding Nine Hundred and
8 Fifty Dollars (\$950) to wit: Bin Y.

9 **COUNT 4**

10 ZENNEY NGUYEN and SOURASITH SINGHARATH

11 **IDENTITY THEFT (Re: Bin Y. #1)**

12 On and between December 7, 2015, and September 6, 2017, in the COUNTY of
13 ALAMEDA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a
14 felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did
15 willfully and unlawfully obtain personal identifying information of Bin Y. and used that
16 information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services,
17 real property, and medical information without the consent of Bin Y.

18 **COUNT 5**

19 ZENNEY NGUYEN

20 **CONSPIRACY (Re: Vargas Turbocharger Technologies/ Theodore C.)**

21 Around May 15, 2018, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
22 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
23 unknown conspirators, who did willfully and unlawfully conspire together with another person or
24 persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the
25 California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and
26 purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

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1 OVERT ACT 1

2 On May 15, 2018, in the County of Alameda, Zenney Nguyen and unknown conspirators
3 entered onto the property of Vargas Turbocharger Technologies.

4 OVERT ACT 2

5 On and between May 12, 2018 and May 15, 2018, in the County of Alameda, Zenney
6 Nguyen and unknown conspirators ordered \$15,000 worth of equipment from Vargas
7 Turbocharger Technologies using Theodore C.'s credit card.

8 OVERT ACT 3

9 On May 15, 2018, in the County of Alameda, Zenney Nguyen and unknown
10 conspirators attempted to pick up \$5,600 worth of merchandise from Vargas Turbocharger
11 Technologies.

12 COUNT 6

13 ZENNEY NGUYEN

14 **BURGLARY (Re: Vargas Turbocharger Technologies)**

15 On May 15, 2018, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
16 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
17 by ZENNEY NGUYEN and unknown conspirators, who did enter a commercial building
18 occupied by Vargas Turbocharger Technologies with the intent to commit larceny and any felony.
19 It is further alleged that the value of the property that they took and intended to take exceeded
20 nine hundred fifty (\$950).

21 COUNT 7

22 ZENNEY NGUYEN

23 **ATTEMPTED GRAND THEFT (Re: Vargas Turbocharger Technologies/Theodore C.)**

24 Around May 15, 2018, in the COUNTY of ALAMEDA, the crime of ATTEMPTED
25 GRAND THEFT in violation of Penal Code section 487(a) and section 664, a felony, was
26 committed by ZENNEY NGUYEN, who did unlawfully attempt to take money and personal
27 property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit:
28 Theodore C.

1 **COUNT 11**

2 ZENNEY NGUYEN

3 **CONSPIRACY (Re: Enterprise/South Atlantic LLC)**

4 Around May 15, 2018, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
5 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
6 unknown conspirators, who did willfully and unlawfully conspire together with another person or
7 persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the
8 California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and
9 purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

10 **OVERT ACT 1**

11 On June 8, 2018, in the County of Alameda, Zenney Nguyen and unknown conspirators
12 entered onto the property of Enterprise Rent-a-Car.

13 **OVERT ACT 2**

14 On June 8, 2018, in the County of Alameda, Zenney Nguyen and unknown conspirators
15 attempted to rent a car using the corporate account of South Atlantic LLC.

16 **COUNT 12**

17 ZENNEY NGUYEN

18 **BURGLARY (Re: Enterprise)**

19 On June 8, 2018, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
20 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
21 by ZENNEY NGUYEN and unknown conspirators, who did enter a commercial building
22 occupied by Enterprise Rent-a-Car with the intent to commit larceny and any felony. It is further
23 alleged that the value of the property that they took and intended to take exceeded nine hundred
24 fifty (\$950).

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1 **COUNT 13**

2 ZENNEY NGUYEN

3 **ATTEMPTED GRAND THEFT (Re: Enterprise/South Atlantic LLC)**

4 On June 8, 2018, in the COUNTY of ALAMEDA, the crime of ATTEMPTED GRAND
5 THEFT in violation of Penal Code section 487(a) and section 664, a felony, was committed by
6 ZENNEY NGUYEN, who did unlawfully attempt to take money and personal property of another
7 of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: South Atlantic LLC.

8 **COUNT 14**

9 ZENNEY NGUYEN

10 **IDENTITY THEFT (Re: Enterprise/South Atlantic LLC)**

11 On and between May 12, 2018 and May 15, 2018, in the COUNTY of ALAMEDA, the
12 crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony, was
13 committed by ZENNEY NGUYEN and unknown conspirators, who did willfully and unlawfully
14 obtain personal identifying information of South Atlantic LLC. and used that information for an
15 unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and
16 medical information without the consent of South Atlantic LLC.

17 **COUNT 15**

18 ZENNEY NGUYEN

19 **IDENTITY THEFT (Re: Enterprise/Kellie W.)**

20 On and between May 12, 2018 and May 15, 2018, in the COUNTY of ALAMEDA, the
21 crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony, was
22 committed by ZENNEY NGUYEN and unknown conspirators, who did willfully and unlawfully
23 obtain personal identifying information of Kellie W. and used that information for an unlawful
24 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
25 information without the consent of Kellie W.

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1 **COUNT 16**

2 ZENNEY NGUYEN

3 **BURGLARY (Re: The Apple Store)**

4 On July 11, 2017, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
5 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
6 by ZENNEY NGUYEN, who did enter a commercial building occupied by The Apple Store with
7 the intent to commit larceny and any felony. It is further alleged that the value of the property
8 that he took and intended to take exceeded nine hundred fifty (\$950).

9 **COUNT 17**

10 ZENNEY NGUYEN

11 **GRAND THEFT (Re: The Apple Store)**

12 On July 11, 2017, in the COUNTY of ALAMEDA, the crime of GRAND THEFT OF
13 PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed by
14 ZENNEY NGUYEN, who did unlawfully take money and personal property of a value exceeding
15 nine hundred fifty dollars (\$950), to wit: APPLE MACBOOK (W461073693) the property of
16 THE APPLE STORE.

17 **COUNT 18**

18 ZENNEY NGUYEN and SOURASITH SINGHARATH

19 **IDENTITY THEFT (Re: Anthony N.)**

20 Around July 5, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
21 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
22 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
23 information of Anthony N. and used that information for an unlawful purpose and to obtain, and
24 attempt to obtain credit, goods, services, real property, and medical information without the
25 consent of Anthony N.

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1 **COUNT 19**

2 ZENNEY NGUYEN

3 **GRAND THEFT (Re: Quynh P.)**

4 Around November 9, 2016, in the COUNTY of ALAMEDA, the crime of GRAND THEFT
5 OF PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed
6 by ZENNEY NGUYEN, who did unlawfully take money and personal property of a value
7 exceeding nine hundred fifty dollars (\$950) of Quynh P.

8 **COUNT 20**

9 ZENNEY NGUYEN

10 **IDENTITY THEFT (Re: Quynh P.)**

11 Around November 9, 2016, in the COUNTY of ALAMEDA, the crime of IDENTITY
12 THEFT in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY
13 NGUYEN, who did willfully and unlawfully obtain personal identifying information of Quynh P.
14 and used that information for an unlawful purpose and to obtain, and attempt to obtain credit,
15 goods, services, real property, and medical information without the consent of Quynh P.

16 **COUNT 21**

17 ZENNEY NGUYEN

18 **CONSPIRACY (Re: Coliseum Lexus/Anthony N.)**

19 Around June 22, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
20 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
21 unknown conspirators, who did willfully and unlawfully conspire together with another person or
22 persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the
23 California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and
24 purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

25 **OVERT ACT 1**

26 On June 8, 2017, in the County of Alameda, Zenney Nguyen and unknown conspirators
27 entered onto the property of Coliseum Lexus.

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1 OVERT ACT 2

2 On June 8, 2017, in the County of Alameda, Zenney Nguyen and unknown conspirators
3 attempted to purchase a car using the personal identifying information of Anthony N.

4 **COUNT 22**

5 ZENNEY NGUYEN

6 **BURGLARY (Re: Coliseum Lexus)**

7 On June 8, 2017, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
8 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
9 by ZENNEY NGUYEN and unknown conspirators, who did enter a commercial building
10 occupied by Coliseum Lexis with the intent to commit larceny and any felony. It is further
11 alleged that the value of the property that they took and intended to take exceeded nine hundred
12 fifty (\$950).

13 **COUNT 23**

14 ZENNEY NGUYEN

15 **GRAND THEFT (Re: Coliseum Lexus)**

16 On June 22, 2017, in the COUNTY of ALAMEDA, the crime of GRAND THEFT OF
17 PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed by
18 ZENNEY NGUYEN, who did unlawfully take money and personal property of a value exceeding
19 nine hundred fifty dollars (\$950), to wit: LEXUS IS250 VIN#JTHBF1D23F5067906 the property
20 of COLISEUM LEXUS.

21 **COUNT 24**

22 ZENNEY NGUYEN and SOURASITH SINGHARATH

23 **CONSPIRACY (Re: Best Buy/Bin Y.#1)**

24 Around September 6, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY,
25 in violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
26 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
27 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
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1 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
2 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

3 OVERT ACT 1

4 On September 6, 2017, in the County of Alameda, Zenney Nguyen applied for a cellular
5 phone using the personal identifying information of Bin Y.

6 OVERT ACT 2

7 On September 6, 2017, in the County of Alameda, Zenney Nguyen used the personal
8 identifying information of Bin Y. to facilitate a purchase of smartphones valued at over \$950.

9 OVERT ACT 3

10 On September 6, 2017, in the County of Alameda, Zenney Nguyen possessed and
11 transported a Verizon contract from Best Buy, signed under the name Bin Y., for the purchase of
12 a smartphone.

13 OVERT ACT 4

14 On September 6, 2017, in the County of Alameda, Sourasith Singharath possessed and
15 transported a receipt from Best Buy for the purchase of a smartphone purchased in the name of
16 Bin Y.

17 COUNT 25

18 ZENNEY NGUYEN and SOURASITH SINGHARATH

19 **BURGLARY (Re: Best Buy)**

20 On September 6, 2017, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
21 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
22 by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did enter a commercial building
23 occupied by Best Buy with the intent to commit larceny and any felony. It is further alleged that
24 the value of the property that they took and intended to take exceeded nine hundred fifty (\$950).

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1 **COUNT 26**

2 ZENNEY NGUYEN and SOURASITH SINGHARATH

3 **GRAND THEFT (Re: Best Buy/Bin Y. #1)**

4 On September 6, 2017, in the COUNTY of ALAMEDA, the crime of GRAND THEFT OF
5 PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed by
6 ZENNEY NGUYEN and SOURASITH SINGHARATH, who did unlawfully take money and
7 personal property of a value exceeding nine hundred fifty dollars (\$950), to wit: Bin Y.

8 **COUNT 27**

9 ZENNEY NGUYEN and SOURASITH SINGHARATH

10 **CONSPIRACY (Re: Target/Sprint/Viktoria T.)**

11 Around September 6, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY,
12 in violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
13 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
14 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
15 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
16 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

17 **OVERT ACT 1**

18 On September 6, 2017, in the County of Alameda, Zenney Nguyen and unknown co-
19 conspirators applied for a cellular phone using the personal identifying information of Viktoria T.

20 **OVERT ACT 2**

21 On September 6, 2017, in the County of Alameda, Zenney Nguyen and unknown
22 coconspirators used the personal identifying information of Viktoria T. to facilitate a the purchase
23 of smartphones valued at over \$950.

24 **OVERT ACT 3**

25 On September 6, 2017, in the County of Alameda, Sourasith Singharath and Zenney
26 Nguyen possessed and transported receipts from Target for the purchase of a smartphone
27 purchased in the name of Viktoria T.

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1 **COUNT 28**

2 ZENNEY NGUYEN and SOURASITH SINGHARATH

3 **BURGLARY (Re: Target)**

4 On September 6, 2017, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
5 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
6 by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did enter a commercial building
7 occupied by Target with the intent to commit larceny and any felony. It is further alleged that the
8 value of the property that they took and intended to take exceeded nine hundred fifty (\$950).

9 **COUNT 29**

10 ZENNEY NGUYEN and SOURASITH SINGHARATH

11 **GRAND THEFT (Re: Target/Sprint/Viktoria T.)**

12 On September 6, 2017, in the COUNTY of ALAMEDA, the crime of GRAND THEFT OF
13 PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed by
14 ZENNEY NGUYEN and SOURASITH SINGHARATH, who did unlawfully take money and
15 personal property of a value exceeding nine hundred fifty dollars (\$950), to wit: Viktoria T.

16 **COUNT 30**

17 ZENNEY NGUYEN and SOURASITH SINGHARATH

18 **IDENTITY THEFT (Re: Viktoria T.)**

19 On September 6, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT
20 in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
21 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
22 information of Viktoria T. and used that information for an unlawful purpose and to obtain, and
23 attempt to obtain credit, goods, services, real property, and medical information without the
24 consent of Viktoria T.

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COUNT 31

ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
CAROLINE HAHN

CONSPIRACY (Re: Victra Pinole/Michelle C.)

On August 27, 2017, in the COUNTY of CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and CAROLINE HAHN, who did willfully and unlawfully conspire together with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On August 27, 2017, in the County of Contra Costa, Zenney Nguyen and Sourasith Singharath entered a Verizon/Victra store.

OVERT ACT 2

On August 27, 2017, in the County of Contra Costa, Zenney Nguyen applied for a cellular phone using the personal identifying information of Michelle C.

OVERT ACT 3

On August 27, 2017, in the County of Contra Costa, Marcus Jackson, an employee of Victra, used the personal identifying information of Michelle C. to facilitate a purchase to Zenney Nguyen, on credit, of a smartphone valued at over \$950.

OVERT ACT 4

On August 27, 2017, in the County of Contra Costa, Caroline Hahn texted Zenney Nguyen about opening an account in the name of Michelle C.

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1 **COUNT 32**

2 ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
3 CAROLINE HAHN

4 **BURGLARY (Re: Victra Pinole)**

5 On August 27, 2017, in the COUNTY of CONTRA COSTA, the crime of SECOND
6 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
7 committed by ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
8 CAROLINE HAHN, who did enter a commercial building occupied by Victra with the intent to
9 commit larceny and any felony. It is further alleged that the value of the property that they took
10 and intended to take exceeded nine hundred fifty (\$950).

11 **COUNT 33**

12 ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
13 CAROLINE HAHN

14 **GRAND THEFT (Re: Victra Pinole/Michelle C.)**

15 On August 27, 2017, in the COUNTY of CONTRA COSTA, the crime of GRAND THEFT
16 OF PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed
17 by ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and CAROLINE
18 HAHN, who did unlawfully take money and personal property of a value exceeding nine hundred
19 fifty dollars (\$950), to wit: Michelle C.

20 **COUNT 34**

21 ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
22 CAROLINE HAHN

23 **IDENTITY THEFT (Re: Michelle C.)**

24 On August 27, 2017, in the COUNTY of CONTRA COSTA, the crime of IDENTITY
25 THEFT in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY
26 NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and CAROLINE HAHN, who
27 did willfully and unlawfully obtain personal identifying information of Michelle C. and used that
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1 information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services,
2 real property, and medical information without the consent of Michelle C.

3 **COUNT 35**

4 ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and

5 CAROLINE HAHN

6 **CONSPIRACY (Re: Victra Pinole/Sankar J.)**

7 On August 29, 2017, in the COUNTY of CONTRA COSTA, the crime of CONSPIRACY,
8 in violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN,
9 SOURASITH SINGHARATH, MARCUS JACKSON and CAROLINE HAHN, who did willfully
10 and unlawfully conspire together with another person or persons whose identity is unknown to
11 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
12 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
13 Defendants committed the following overt act(s):

14 **OVERT ACT 1**

15 On August 29, 2017, in the County of Contra Costa, Zenney Nguyen and Sourasith
16 Singharath entered a Verizon/Victra store.

17 **OVERT ACT 2**

18 On August 29, 2017, in the County of Contra Costa, Zenney Nguyen applied for a cellular
19 phone using the personal identifying information of Sankar J.

20 **OVERT ACT 3**

21 On August 29, 2017, in the County of Contra Costa, Caroline Hahn texted and discussed
22 Sankar J.'s personal identifying information to Zenney Nguyen.

23 **OVERT ACT 4**

24 On August 29, 2017, in the County of Contra Costa, Marcus Jackson, an employee of
25 Victra, used the personal identifying information of Sankar J. to facilitate a purchase to Zenney
26 Nguyen, on credit, of a smartphone valued at over \$950.

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1 **COUNT 36**

2 ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
3 CAROLINE HAHN

4 **BURGLARY (Re: Victra Pinole)**

5 On August 29, 2017, in the COUNTY of CONTRA COSTA, the crime of SECOND
6 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
7 committed by ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
8 CAROLINE HAHN, who did enter a commercial building occupied by Victra with the intent to
9 commit larceny and any felony. It is further alleged that the value of the property that they took
10 and intended to take exceeded nine hundred fifty (\$950).

11 **COUNT 37**

12 ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
13 CAROLINE HAHN

14 **GRAND THEFT (Re: Victra Pinole/Sankar J.)**

15 On August 29, 2017, in the COUNTY of CONTRA COSTA, the crime of GRAND THEFT
16 OF PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed
17 by ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and CAROLINE
18 HAHN, who did unlawfully take money and personal property of a value exceeding nine hundred
19 fifty dollars (\$950), to wit: Sankar J.

20 **COUNT 38**

21 ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
22 CAROLINE HAHN

23 **IDENTITY THEFT (Re: Sankar J.)**

24 On August 27, 2017, in the COUNTY of CONTRA COSTA, the crime of IDENTITY
25 THEFT in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY
26 NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and CAROLINE HAHN, who
27 did willfully and unlawfully obtain personal identifying information of Sankar J. and used that
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1 information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services,
2 real property, and medical information without the consent of Sankar J.

3 **COUNT 39**

4 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

5 **CONSPIRACY (Re: Victra Pinole/Hao L.)**

6 On August 31, 2017, in the COUNTY of CONTRA COSTA, the crime of CONSPIRACY,
7 in violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN,
8 SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and unlawfully
9 conspire together with another person or persons whose identity is unknown to commit the crime
10 of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the
11 purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants
12 committed the following overt act(s):

13 **OVERT ACT 1**

14 On August 31, 2017, in the County of Contra Costa, Zenney Nguyen and Sourasith
15 Singharath entered a Verizon/Victra store.

16 **OVERT ACT 2**

17 On August 31, 2017, in the County of Contra Costa, Zenney Nguyen applied for a cellular
18 phone using the personal identifying information of Hao L.

19 **OVERT ACT 3**

20 On August 31, 2017, in the County of Contra Costa, Marcus Jackson, an employee of
21 Victra, used the personal identifying information of Hao L. to facilitate a purchase to Zenney
22 Nguyen, on credit, of a smartphone valued at over \$950.

23 **COUNT 40**

24 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

25 **BURGLARY (Re: Victra Pinole)**

26 On August 27, 2017, in the COUNTY of CONTRA COSTA, the crime of SECOND
27 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
28 committed by ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON,

1 who did enter a commercial building occupied by Victra with the intent to commit larceny and
2 any felony. It is further alleged that the value of the property that they took and intended to take
3 exceeded nine hundred fifty (\$950).

4 **COUNT 41**

5 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

6 **GRAND THEFT (Re: Victra Pinole/Hao L.)**

7 On August 27, 2017, in the COUNTY of CONTRA COSTA, the crime of GRAND THEFT
8 OF PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed
9 by ZENNEY NGUYEN, SOURASITH SINGHARATH, and MARCUS JACKSON, who did
10 unlawfully take money and personal property of a value exceeding nine hundred fifty dollars
11 (\$950), to wit: Hao L.

12 **COUNT 42**

13 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

14 **IDENTITY THEFT (Re: Hao L.)**

15 On August 27, 2017, in the COUNTY of CONTRA COSTA, the crime of IDENTITY
16 THEFT in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY
17 NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and
18 unlawfully obtain personal identifying information of Hio L. and used that information for an
19 unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and
20 medical information without the consent of Hao L.

21 **COUNT 43**

22 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

23 **CONSPIRACY (Re: Victra Pinole/Annie T.)**

24 On September 22, 2017, in the COUNTY of CONTRA COSTA, the crime of
25 CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by
26 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON, who did
27 willfully and unlawfully conspire together with another person or persons whose identity is
28 unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a

felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On September 22, 2017, in the County of Contra Costa, Zenney Nguyen and Sourasith Singharath entered a Verizon/Victra store.

OVERT ACT 2

On September 22, 2017, in the County of Contra Costa, Zenney Nguyen applied for a cellular phone using the personal identifying information of Annie T.

OVERT ACT 3

On September 22, 2017, in the County of Contra Costa, Marcus Jackson, an employee of Victra, used the personal identifying information of Annie T. to facilitate a purchase to Zenney Nguyen, on credit, of a smartphone valued at over \$950.

COUNT 44

ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

BURGLARY (Re: Victra Pinole)

On September 22, 2017, in the COUNTY of CONTRA COSTA, the crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed by ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON, who did enter a commercial building occupied by Victra with the intent to commit larceny and any felony. It is further alleged that the value of the property that they took and intended to take exceeded nine hundred fifty (\$950).

COUNT 45

ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

GRAND THEFT (Re: Victra Pinole/Annie T.)

On September 22, 2017, in the COUNTY of CONTRA COSTA, the crime of GRAND THEFT OF PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN, SOURASITH SINGHARATH, and MARCUS JACKSON,

1 who did unlawfully take money and personal property of a value exceeding nine hundred fifty
2 dollars (\$950), to wit: Annie T.

3 **COUNT 46**

4 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

5 **IDENTITY THEFT (Re: Annie T.)**

6 On September 22, 2017, in the COUNTY of CONTRA COSTA, the crime of IDENTITY
7 THEFT in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY
8 NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and
9 unlawfully obtain personal identifying information of Annie T. and used that information for an
10 unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and
11 medical information without the consent of Annie T.

12 **COUNT 47**

13 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

14 **CONSPIRACY (Re: Victra Pinole/Jason F.)**

15 On September 25, 2017, in the COUNTY of CONTRA COSTA, the crime of
16 CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by
17 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON, who did
18 willfully and unlawfully conspire together with another person or persons whose identity is
19 unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
20 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
21 conspiracy, Defendants committed the following overt act(s):

22 **OVERT ACT 1**

23 On September 25, 2017, in the County of Contra Costa, Zenney Nguyen and Sourasith
24 Singharath entered a Verizon/Victra store.

25 **OVERT ACT 2**

26 On September 25, 2017, in the County of Contra Costa, Zenney Nguyen applied for a
27 cellular phone using the personal identifying information of Jason F.

28 ///

1 OVERT ACT 3

2 On September 25, 2017, in the County of Contra Costa, Marcus Jackson, an employee of
3 Victra, used the personal identifying information of Jason F. to facilitate a purchase to Zenney
4 Nguyen, on credit, of a smartphone valued at over \$950.

5 COUNT 48

6 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

7 **BURGLARY (Re: Victra Pinole)**

8 On September 22, 2017, in the COUNTY of CONTRA COSTA, the crime of SECOND
9 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
10 committed by ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON,
11 who did enter a commercial building occupied by Victra with the intent to commit larceny and
12 any felony. It is further alleged that the value of the property that they took and intended to take
13 exceeded nine hundred fifty (\$950).

14 COUNT 49

15 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

16 **GRAND THEFT (Re: Victra Pinole/Jason F.)**

17 On September 22, 2017, in the COUNTY of CONTRA COSTA, the crime of GRAND
18 THEFT OF PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was
19 committed by ZENNEY NGUYEN, SOURASITH SINGHARATH, and MARCUS JACKSON,
20 who did unlawfully take money and personal property of a value exceeding nine hundred fifty
21 dollars (\$950), to wit: Jason F.

22 COUNT 50

23 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

24 **IDENTITY THEFT (Re: Jason F.)**

25 On September 22, 2017, in the COUNTY of CONTRA COSTA, the crime of IDENTITY
26 THEFT in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY
27 NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and
28 unlawfully obtain personal identifying information of Jason F. and used that information for an

1 unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and
2 medical information without the consent of Jason F.

3 **COUNT 51**

4 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

5 **CONSPIRACY (Re: Victra Berkeley/Gordon L.)**

6 On November 8, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
7 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN,
8 SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and unlawfully
9 conspire together with another person or persons whose identity is unknown to commit the crime
10 of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the
11 purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants
12 committed the following overt act(s):

13 **OVERT ACT 1**

14 On November 8, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
15 Singharath entered a Verizon/Victra store.

16 **OVERT ACT 2**

17 On November 8, 2017, in the County of Alameda, Zenney Nguyen applied for a cellular
18 phone using the personal identifying information of Gordon L.

19 **OVERT ACT 3**

20 On November 8, 2017, in the County of Alameda, Marcus Jackson, an employee of Victra,
21 used the personal identifying information of Gordon L. to facilitate a purchase to Zenney Nguyen,
22 on credit, of a smartphone valued at over \$950.

23 **COUNT 52**

24 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

25 **BURGLARY (Re: Victra Berkeley)**

26 On November 8, 2017, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
27 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
28 by ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON, who did

1 enter a commercial building occupied by Victra with the intent to commit larceny and any felony.
2 It is further alleged that the value of the property that they took and intended to take exceeded
3 nine hundred fifty (\$950).

4 **COUNT 53**

5 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

6 **GRAND THEFT (Re: Victra Berkeley/Gordon L.)**

7 On November 8, 2017, in the COUNTY of ALAMEDA, the crime of GRAND THEFT OF
8 PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed by
9 ZENNEY NGUYEN, SOURASITH SINGHARATH, and MARCUS JACKSON, who did
10 unlawfully take money and personal property of a value exceeding nine hundred fifty dollars
11 (\$950), to wit: Gordon L.

12 **COUNT 54**

13 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

14 **IDENTITY THEFT (Re: Gordon L.)**

15 On November 8, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT
16 in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN,
17 SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and unlawfully
18 obtain personal identifying information of Gordon L. and used that information for an unlawful
19 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
20 information without the consent of Gordon L.

21 **COUNT 55**

22 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

23 **CONSPIRACY (Re: Victra Berkeley/Micheline L.)**

24 On November 15, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
25 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN,
26 SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and unlawfully
27 conspire together with another person or persons whose identity is unknown to commit the crime
28 of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the

1 purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants
2 committed the following overt act(s):

3 OVERT ACT 1

4 On November 15, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
5 Singharath entered a Verizon/Victra store.

6 OVERT ACT 2

7 On November 15, 2017, in the County of Alameda, Zenney Nguyen applied for a cellular
8 phone using the personal identifying information of Micheline L.

9 OVERT ACT 3

10 On November 15, 2017, in the County of Alameda, Marcus Jackson, an employee of
11 Victra, used the personal identifying information of Micheline L. to facilitate a purchase to
12 Zenney Nguyen, on credit, of a smartphone valued at over \$950.

13 COUNT 56

14 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

15 **BURGLARY (Re: Victra Berkeley)**

16 On November 15, 2017, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
17 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
18 by ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON, who did
19 enter a commercial building occupied by Victra with the intent to commit larceny and any felony.
20 It is further alleged that the value of the property that they took and intended to take exceeded
21 nine hundred fifty (\$950).

22 COUNT 57

23 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

24 **GRAND THEFT (Re: Victra Berkeley/Micheline L.)**

25 On November 15, 2017, in the COUNTY of ALAMEDA, the crime of GRAND THEFT
26 OF PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed
27 by ZENNEY NGUYEN, SOURASITH SINGHARATH, and MARCUS JACKSON, who did
28

1 unlawfully take money and personal property of a value exceeding nine hundred fifty dollars
2 (\$950), to wit: Micheline L.

3 **COUNT 58**

4 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

5 **IDENTITY THEFT (Re: Micheline L.)**

6 On November 15, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT
7 in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN,
8 SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and unlawfully
9 obtain personal identifying information of Micheline L. and used that information for an unlawful
10 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
11 information without the consent of Micheline L.

12 **COUNT 59**

13 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

14 **CONSPIRACY (Re: Victra Berkeley/Hoang N.)**

15 On November 28, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
16 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN,
17 SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and unlawfully
18 conspire together with another person or persons whose identity is unknown to commit the crime
19 of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the
20 purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants
21 committed the following overt act(s):

22 **OVERT ACT 1**

23 On November 28, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
24 Singharath entered a Verizon/Victra store.

25 **OVERT ACT 2**

26 On November 28, 2017, in the County of Alameda, Zenney Nguyen applied for a cellular
27 phone using the personal identifying information of Hoang N.

28 ///

1 OVERT ACT 3

2 On November 28, 2017, in the County of Alameda, Marcus Jackson, an employee of
3 Victra, used the personal identifying information of Hoang N. to facilitate a purchase to Zenney
4 Nguyen, on credit, of a smartphone valued at over \$950.

5 COUNT 60

6 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

7 **BURGLARY (Re: Victra Berkeley)**

8 On November 28, 2017, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
9 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
10 by ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON, who did
11 enter a commercial building occupied by Victra with the intent to commit larceny and any felony.
12 It is further alleged that the value of the property that they took and intended to take exceeded
13 nine hundred fifty (\$950).

14 COUNT 61

15 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

16 **GRAND THEFT (Re: Victra Berkeley/Hoang N.)**

17 On November 28, 2017, in the COUNTY of ALAMEDA, the crime of GRAND THEFT
18 OF PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed
19 by ZENNEY NGUYEN, SOURASITH SINGHARATH, and MARCUS JACKSON, who did
20 unlawfully take money and personal property of a value exceeding nine hundred fifty dollars
21 (\$950), to wit: Hoang N.

22 COUNT 62

23 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

24 **IDENTITY THEFT (Re: Hoang N.)**

25 On November 28, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT
26 in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN,
27 SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and unlawfully
28 obtain personal identifying information of Hoang N. and used that information for an unlawful

1 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
2 information without the consent of Hoang N.

3 **COUNT 63**

4 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

5 **CONSPIRACY (Re: Victra Berkeley/Phuoc N.)**

6 On November 28, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
7 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN,
8 SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and unlawfully
9 conspire together with another person or persons whose identity is unknown to commit the crime
10 of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the
11 purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants
12 committed the following overt act(s):

13 **OVERT ACT 1**

14 On November 28, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
15 Singharath entered a Verizon/Victra store.

16 **OVERT ACT 2**

17 On November 28, 2017, in the County of Alameda, Zenney Nguyen applied for a cellular
18 phone using the personal identifying information of Phuoc N.

19 **OVERT ACT 3**

20 On November 28, 2017, in the County of Alameda, Marcus Jackson, an employee of
21 Victra, used the personal identifying information of Phuoc N. to facilitate a purchase to Zenney
22 Nguyen, on credit, of a smartphone valued at over \$950.

23 **COUNT 64**

24 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

25 **BURGLARY (Re: Victra Berkeley)**

26 On November 28, 2017, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
27 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
28 by ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON, who did

1 enter a commercial building occupied by Victra with the intent to commit larceny and any felony.
2 It is further alleged that the value of the property that they took and intended to take exceeded
3 nine hundred fifty (\$950).

4 **COUNT 65**

5 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

6 **GRAND THEFT (Re: Victra Berkeley/Phuoc N.)**

7 On November 28, 2017, in the COUNTY of ALAMEDA, the crime of GRAND THEFT
8 OF PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed
9 by ZENNEY NGUYEN, SOURASITH SINGHARATH, and MARCUS JACKSON, who did
10 unlawfully take money and personal property of a value exceeding nine hundred fifty dollars
11 (\$950), to wit: Phuoc N.

12 **COUNT 66**

13 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

14 **IDENTITY THEFT (Re: Phuoc N.)**

15 On December 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT
16 in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN,
17 SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and unlawfully
18 obtain personal identifying information of Phuoc N. and used that information for an unlawful
19 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
20 information without the consent of Phuoc N.

21 **COUNT 67**

22 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

23 **CONSPIRACY (Re: Victra Berkeley/Cho D.)**

24 On December 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
25 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN,
26 SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and unlawfully
27 conspire together with another person or persons whose identity is unknown to commit the crime
28 of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the

1 purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants
2 committed the following overt act(s):

3 OVERT ACT 1

4 On December 1, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
5 Singharath entered a Verizon/Victra store.

6 OVERT ACT 2

7 On December 1, 2017, in the County of Alameda, Zenney Nguyen applied for a cellular
8 phone using the personal identifying information of Cho D.

9 OVERT ACT 3

10 On December 1, 2017, in the County of Alameda, Marcus Jackson, an employee of Victra,
11 used the personal identifying information of Cho D. to facilitate a purchase to Zenney Nguyen, on
12 credit, of a smartphone valued at over \$950.

13 COUNT 68

14 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

15 BURGLARY (Re: Victra Berkeley)

16 On December 1, 2017, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
17 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
18 by ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON, who did
19 enter a commercial building occupied by Victra with the intent to commit larceny and any felony.
20 It is further alleged that the value of the property that they took and intended to take exceeded
21 nine hundred fifty (\$950).

22 COUNT 69

23 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

24 GRAND THEFT (Re: Victra Berkeley/Cho D.)

25 On December 1, 2017, in the COUNTY of ALAMEDA, the crime of GRAND THEFT OF
26 PERSONAL PROPERTY in violation of Penal Code section 487(a), a felony, was committed by
27 ZENNEY NGUYEN, SOURASITH SINGHARATH, and MARCUS JACKSON, who did
28

1 unlawfully take money and personal property of a value exceeding nine hundred fifty dollars
2 (\$950), to wit: Cho D.

3 **COUNT 70**

4 ZENNEY NGUYEN, SOURASITH SINGHARATH and MARCUS JACKSON

5 **IDENTITY THEFT (Re: Cho D.)**

6 On December 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT
7 in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN,
8 SOURASITH SINGHARATH and MARCUS JACKSON, who did willfully and unlawfully
9 obtain personal identifying information of Cho D. and used that information for an unlawful
10 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
11 information without the consent of Cho D.

12 **COUNT 71**

13 ZENNEY NGUYEN and SOURASITH SINGHARATH

14 **CONSPIRACY (Re: Tan N.)**

15 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
16 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
17 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
18 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
19 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
20 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

21 **OVERT ACT 1**

22 Around July 1, 2017, in the County of Alameda, Zenney Nguyen and unknown
23 coconspirators changed account passwords to Tan N.'s accounts.

24 **OVERT ACT 2**

25 Around July 1, 2017, in the County of Alameda, Zenney Nguyen and unknown
26 coconspirators withdrew over \$950 from Tan N.'s bank account.

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28 ///

1 OVERT ACT 3

2 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
3 Singharath possessed and transported the personal identifying information of Tan N. on multiple
4 electronic devices.

5 COUNT 72

6 ZENNEY NGUYEN and SOURASITH SINGHARATH

7 **GRAND THEFT (Re: Tan N.)**

8 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
9 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH
10 SINGHARATH, who did unlawfully take money and personal property of another of a value
11 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Tan N.

12 COUNT 73

13 ZENNEY NGUYEN and SOURASITH SINGHARATH

14 **IDENTITY THEFT (Re: Tan N.)**

15 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
16 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
17 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
18 information of Tan N. and used that information for an unlawful purpose and to obtain, and
19 attempt to obtain credit, goods, services, real property, and medical information without the
20 consent of Tan N.

21 COUNT 74

22 ZENNEY NGUYEN and SOURASITH SINGHARATH

23 **CONSPIRACY (Re: Thanh N.)**

24 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
25 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
26 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
27 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
28

1 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
2 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

3 OVERT ACT 1

4 Around July 1, 2017, in the County of Alameda, Zenney Nguyen and unknown
5 coconspirators changed account passwords to Thanh N.'s accounts.

6 OVERT ACT 2

7 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
8 Singharath possessed and transported the personal identifying information of Thanh N. on
9 multiple electronic devices.

10 COUNT 75

11 ZENNEY NGUYEN and SOURASITH SINGHARATH

12 ATTEMPTED GRAND THEFT (Re: Thanh N.)

13 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of ATTEMPTED
14 GRAND THEFT in violation of Penal Code section 487(a) and section 664, a felony, was
15 committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did unlawfully
16 attempt to take money and personal property of another of a value exceeding Nine Hundred and
17 Fifty Dollars (\$950) to wit: Thanh N.

18 COUNT 76

19 ZENNEY NGUYEN and SOURASITH SINGHARATH

20 IDENTITY THEFT (Re: Thanh N.)

21 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
22 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
23 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
24 information of Thanh N. and used that information for an unlawful purpose and to obtain, and
25 attempt to obtain credit, goods, services, real property, and medical information without the
26 consent of Thanh N.

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COUNT 77

ZENNEY NGUYEN and SOURASITH SINGHARATH

CONSPIRACY (Re: Dominic T.)

Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith Singharath possessed and transported the personal identifying information of Dominic T. on multiple electronic devices.

COUNT 78

ZENNEY NGUYEN and SOURASITH SINGHARATH

ATTEMPTED GRAND THEFT (Re: Dominic T.)

Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of ATTEMPTED GRAND THEFT in violation of Penal Code section 487(a) and section 664, a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did unlawfully attempt to take money and personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Dominic T.

COUNT 79

ZENNEY NGUYEN and SOURASITH SINGHARATH

IDENTITY THEFT (Re: Dominic T.)

Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying information of Dominic T. and used that information for an unlawful purpose and to obtain, and

1 attempt to obtain credit, goods, services, real property, and medical information without the
2 consent of Dominic T.

3 **COUNT 80**

4 ZENNEY NGUYEN and SOURASITH SINGHARATH

5 **CONSPIRACY (Re: Cecilia T.)**

6 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
7 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
8 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
9 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
10 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
11 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

12 **OVERT ACT 1**

13 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
14 Singharath possessed and transported the personal identifying information of Cecilia T. on
15 multiple electronic devices.

16 **COUNT 81**

17 ZENNEY NGUYEN and SOURASITH SINGHARATH

18 **GRAND THEFT (Re: Cecilia T.)**

19 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
20 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH
21 SINGHARATH, who did unlawfully take money and personal property of another of a value
22 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Cecilia T.

23 **COUNT 82**

24 ZENNEY NGUYEN and SOURASITH SINGHARATH

25 **IDENTITY THEFT (Re: Cecilia T.)**

26 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
27 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
28 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying

1 information of Cecilia T. and used that information for an unlawful purpose and to obtain, and
2 attempt to obtain credit, goods, services, real property, and medical information without the
3 consent of Cecilia T.

4 **COUNT 83**

5 ZENNEY NGUYEN and SOURASITH SINGHARATH

6 **CONSPIRACY (Re: Mark R. #1)**

7 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
8 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
9 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
10 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
11 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
12 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

13 **OVERT ACT 1**

14 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
15 Singharath possessed and transported the personal identifying information of Mark R. on multiple
16 electronic devices.

17 **COUNT 84**

18 ZENNEY NGUYEN and SOURASITH SINGHARATH

19 **GRAND THEFT (Re: Mark R. #1)**

20 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
21 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH
22 SINGHARATH, who did unlawfully take money and personal property of another of a value
23 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Mark R.

24 **COUNT 85**

25 ZENNEY NGUYEN and SOURASITH SINGHARATH

26 **IDENTITY THEFT (Re: Mark R. #1)**

27 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
28 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and

1 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
2 information of Mark R. and used that information for an unlawful purpose and to obtain, and
3 attempt to obtain credit, goods, services, real property, and medical information without the
4 consent of Mark R.

5 **COUNT 86**

6 ZENNEY NGUYEN and SOURASITH SINGHARATH

7 **CONSPIRACY (Re: Dianne R.)**

8 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
9 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
10 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
11 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
12 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
13 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

14 **OVERT ACT 1**

15 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
16 Singharath possessed and transported the personal identifying information of Dianne R. on
17 multiple electronic devices.

18 **COUNT 87**

19 ZENNEY NGUYEN and SOURASITH SINGHARATH

20 **GRAND THEFT (Re: Dianne R.)**

21 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
22 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH
23 SINGHARATH, who did unlawfully take money and personal property of another of a value
24 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Dianne R.

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1 **COUNT 88**

2 ZENNEY NGUYEN and SOURASITH SINGHARATH

3 **IDENTITY THEFT (Re: Dianne R.)**

4 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
5 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
6 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
7 information of Dianne R. and used that information for an unlawful purpose and to obtain, and
8 attempt to obtain credit, goods, services, real property, and medical information without the
9 consent of Dianne R.

10 **COUNT 89**

11 ZENNEY NGUYEN and SOURASITH SINGHARATH

12 **CONSPIRACY (Re: Timothy S.)**

13 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
14 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
15 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
16 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
17 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
18 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

19 **OVERT ACT 1**

20 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
21 Singharath possessed and transported the personal identifying information of Timothy S. on
22 multiple electronic devices.

23 **COUNT 90**

24 ZENNEY NGUYEN and SOURASITH SINGHARATH

25 **ATTEMPTED GRAND THEFT (Re: Timothy S.)**

26 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of ATTEMPTED
27 GRAND THEFT in violation of Penal Code section 487(a) and section 664, a felony, was
28 committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did unlawfully

1 attempt to take money and personal property of another of a value exceeding Nine Hundred and
2 Fifty Dollars (\$950) to wit: Timothy S.

3 **COUNT 91**

4 ZENNEY NGUYEN and SOURASITH SINGHARATH

5 **IDENTITY THEFT (Re: Timothy S.)**

6 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
7 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
8 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
9 information of Timothy S. and used that information for an unlawful purpose and to obtain, and
10 attempt to obtain credit, goods, services, real property, and medical information without the
11 consent of Timothy S.

12 **COUNT 92**

13 ZENNEY NGUYEN and SOURASITH SINGHARATH

14 **CONSPIRACY (Re: Phil A.)**

15 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
16 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
17 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
18 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
19 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
20 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

21 **OVERT ACT 1**

22 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
23 Singharath possessed and transported the personal identifying information of Phil A. on multiple
24 electronic devices.

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1 **COUNT 93**

2 ZENNEY NGUYEN and SOURASITH SINGHARATH

3 **GRAND THEFT (Re: Phil A.)**

4 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
5 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH
6 SINGHARATH, who did unlawfully take money and personal property of another of a value
7 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Phil A.

8 **COUNT 94**

9 ZENNEY NGUYEN and SOURASITH SINGHARATH

10 **IDENTITY THEFT (Re: Phil A.)**

11 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
12 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
13 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
14 information of Phil A. and used that information for an unlawful purpose and to obtain, and
15 attempt to obtain credit, goods, services, real property, and medical information without the
16 consent of Phil A.

17 **COUNT 95**

18 ZENNEY NGUYEN and SOURASITH SINGHARATH

19 **CONSPIRACY (Re: Stephen K.)**

20 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
21 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
22 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
23 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
24 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
25 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

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1 OVERT ACT 1

2 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
3 Singharath possessed and transported the personal identifying information of Stephen K. on
4 multiple electronic devices.

5 COUNT 96

6 ZENNEY NGUYEN and SOURASITH SINGHARATH

7 **GRAND THEFT (Re: Stephen K.)**

8 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
9 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH
10 SINGHARATH, who did unlawfully take money and personal property of another of a value
11 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Stephen K.

12 COUNT 97

13 ZENNEY NGUYEN and SOURASITH SINGHARATH

14 **IDENTITY THEFT (Re: Stephen K.)**

15 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
16 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
17 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
18 information of Stephen K. and used that information for an unlawful purpose and to obtain, and
19 attempt to obtain credit, goods, services, real property, and medical information without the
20 consent of Stephen K.

21 COUNT 98

22 ZENNEY NGUYEN and SOURASITH SINGHARATH

23 **CONSPIRACY (Re: Daisy W.)**

24 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
25 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
26 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
27 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
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1 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
2 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

3 OVERT ACT 1

4 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
5 Singharath possessed and transported the personal identifying information of Daisy W. on
6 multiple electronic devices.

7 COUNT 99

8 ZENNEY NGUYEN and SOURASITH SINGHARATH

9 GRAND THEFT (Re: Daisy W.)

10 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
11 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH
12 SINGHARATH, who did unlawfully take money and personal property of another of a value
13 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Daisy W.

14 COUNT 100

15 ZENNEY NGUYEN and SOURASITH SINGHARATH

16 IDENTITY THEFT (Re: Daisy W.)

17 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
18 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
19 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
20 information of Daisy W. and used that information for an unlawful purpose and to obtain, and
21 attempt to obtain credit, goods, services, real property, and medical information without the
22 consent of Daisy W.

23 COUNT 101

24 ZENNEY NGUYEN and SOURASITH SINGHARATH

25 CONSPIRACY (Re: Michael A.)

26 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
27 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
28 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another

1 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
2 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
3 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

4 OVERT ACT 1

5 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
6 Singharath possessed and transported the personal identifying information of Michael A. on
7 multiple electronic devices.

8 COUNT 102

9 ZENNEY NGUYEN and SOURASITH SINGHARATH

10 **GRAND THEFT (Re: Michael A.)**

11 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
12 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH
13 SINGHARATH, who did unlawfully take money and personal property of another of a value
14 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Michael A.

15 COUNT 103

16 ZENNEY NGUYEN and SOURASITH SINGHARATH

17 **IDENTITY THEFT (Re: Michael A.)**

18 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
19 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
20 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
21 information of Michael A. and used that information for an unlawful purpose and to obtain, and
22 attempt to obtain credit, goods, services, real property, and medical information without the
23 consent of Michael A.

24 COUNT 104

25 ZENNEY NGUYEN and SOURASITH SINGHARATH

26 **CONSPIRACY (Re: Sharon L.)**

27 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
28 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and

1 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
2 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
3 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
4 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

5 OVERT ACT 1

6 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
7 Singharath possessed and transported the personal identifying information of Sharon L. on
8 multiple electronic devices.

9 COUNT 105

10 ZENNEY NGUYEN and SOURASITH SINGHARATH

11 ATTEMPTED GRAND THEFT (Re: Sharon L.)

12 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of ATTEMPTED
13 GRAND THEFT in violation of Penal Code section 487(a) and section 664, a felony, was
14 committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did unlawfully
15 attempt to take money and personal property of another of a value exceeding Nine Hundred and
16 Fifty Dollars (\$950) to wit: Sharon L.

17 COUNT 106

18 ZENNEY NGUYEN and SOURASITH SINGHARATH

19 IDENTITY THEFT (Re: Sharon L.)

20 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
21 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
22 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
23 information of Sharon L. and used that information for an unlawful purpose and to obtain, and
24 attempt to obtain credit, goods, services, real property, and medical information without the
25 consent of Sharon L.

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COUNT 107

ZENNEY NGUYEN and SOURASITH SINGHARATH

CONSPIRACY (Re: Remy N.)

Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith Singharath possessed and transported the personal identifying information of Remy N. on multiple electronic devices.

COUNT 108

ZENNEY NGUYEN and SOURASITH SINGHARATH

ATTEMPTED GRAND THEFT (Re: Remy N.)

Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of ATTEMPTED GRAND THEFT in violation of Penal Code section 487(a) and section 664, a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did unlawfully attempt to take money and personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Remy N.

COUNT 109

ZENNEY NGUYEN and SOURASITH SINGHARATH

IDENTITY THEFT (Re: Remy N.)

Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying information of Remy N. and used that information for an unlawful purpose and to obtain, and

1 attempt to obtain credit, goods, services, real property, and medical information without the
2 consent of Remy N.

3 **COUNT 110**

4 ZENNEY NGUYEN and SOURASITH SINGHARATH

5 **CONSPIRACY (Re: Sara N.)**

6 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
7 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
8 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
9 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
10 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
11 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

12 **OVERT ACT 1**

13 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
14 Singharath possessed and transported the personal identifying information of Sara N. on multiple
15 electronic devices.

16 **COUNT 111**

17 ZENNEY NGUYEN and SOURASITH SINGHARATH

18 **ATTEMPTED GRAND THEFT (Re: Sara N.)**

19 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of ATTEMPTED
20 GRAND THEFT in violation of Penal Code section 487(a) and section 664, a felony, was
21 committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did unlawfully
22 attempt to take money and personal property of another of a value exceeding Nine Hundred and
23 Fifty Dollars (\$950) to wit: Sara N.

24 **COUNT 112**

25 ZENNEY NGUYEN and SOURASITH SINGHARATH

26 **IDENTITY THEFT (Re: Sara N.)**

27 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
28 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and

1 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
2 information of Sara N. and used that information for an unlawful purpose and to obtain, and
3 attempt to obtain credit, goods, services, real property, and medical information without the
4 consent of Sara N.

5 **COUNT 113**

6 ZENNEY NGUYEN and SOURASITH SINGHARATH

7 **CONSPIRACY (Re: Douglas W.)**

8 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
9 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
10 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
11 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
12 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
13 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

14 **OVERT ACT 1**

15 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
16 Singharath possessed and transported the personal identifying information of Douglas W. on
17 multiple electronic devices.

18 **COUNT 114**

19 ZENNEY NGUYEN and SOURASITH SINGHARATH

20 **ATTEMPTED GRAND THEFT (Re: Douglas W.)**

21 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of ATTEMPTED
22 GRAND THEFT in violation of Penal Code section 487(a) and section 664, a felony, was
23 committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did unlawfully
24 attempt to take money and personal property of another of a value exceeding Nine Hundred and
25 Fifty Dollars (\$950) to wit: Douglas W.

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1 **COUNT 115**

2 ZENNEY NGUYEN and SOURASITH SINGHARATH

3 **IDENTITY THEFT (Re: Douglas W.)**

4 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
5 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
6 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
7 information of Douglas W. and used that information for an unlawful purpose and to obtain, and
8 attempt to obtain credit, goods, services, real property, and medical information without the
9 consent of Douglas W.

10 **COUNT 116**

11 ZENNEY NGUYEN and SOURASITH SINGHARATH

12 **CONSPIRACY (Re: Mei M.)**

13 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
14 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
15 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
16 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
17 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
18 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

19 **OVERT ACT 1**

20 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
21 Singharath possessed and transported the personal identifying information of Mei M. on multiple
22 electronic devices.

23 **COUNT 117**

24 ZENNEY NGUYEN and SOURASITH SINGHARATH

25 **GRAND THEFT (Re: Mei M.)**

26 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
27 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH
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1 SINGHARATH, who did unlawfully take money and personal property of another of a value
2 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Mei M.

3 **COUNT 118**

4 ZENNEY NGUYEN and SOURASITH SINGHARATH

5 **IDENTITY THEFT (Re: Mei M.)**

6 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
7 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
8 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying
9 information of Mei M. and used that information for an unlawful purpose and to obtain, and
10 attempt to obtain credit, goods, services, real property, and medical information without the
11 consent of Mei M.

12 **COUNT 119**

13 ZENNEY NGUYEN and SOURASITH SINGHARATH

14 **CONSPIRACY (Re: Yim W.)**

15 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
16 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
17 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
18 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
19 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
20 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

21 **OVERT ACT 1**

22 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
23 Singharath possessed and transported the personal identifying information of Yim W. on multiple
24 electronic devices.

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1 OVERT ACT 1

2 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
3 Singharath possessed and transported the personal identifying information of Joann P. on multiple
4 electronic devices.

5 OVERT ACT 2

6 Around July 18, 2017, in the County of Alameda, Joann P. received a phone call from a
7 woman claiming to be a Bank of America representative asking for Joann P.'s personal
8 information.

9 OVERT ACT 3

10 Around July 18, 2017, in the County of Alameda a Comcast account was setup in the name
11 of Joann P. that was registered to the home address of Caroline Hahns' parents.

12 COUNT 123

13 ZENNEY NGUYEN and SOURASITH SINGHARATH and CAROLINE HAHN

14 **GRAND THEFT (Re: Joann P.)**

15 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
16 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN, SOURASITH
17 SINGHARATH and CAROLINE HAHN, who did unlawfully take money and personal property
18 of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Joann P.

19 COUNT 124

20 ZENNEY NGUYEN, SOURASITH SINGHARATH and CAROLINE HAHN

21 **IDENTITY THEFT (Re: Joann P.)**

22 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
23 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN,
24 SOURASITH SINGHARATH and CAROLINE HAHN, who did willfully and unlawfully obtain
25 personal identifying information of Joann P. and used that information for an unlawful purpose
26 and to obtain, and attempt to obtain credit, goods, services, real property, and medical information
27 without the consent of Joann P.

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COUNT 125

ZENNEY NGUYEN and SOURASITH SINGHARATH

CONSPIRACY (Re: Rebecca R.)

Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith Singharath possessed and transported the personal identifying information of Rebecca R. on multiple electronic devices.

COUNT 126

ZENNEY NGUYEN and SOURASITH SINGHARATH

GRAND THEFT (Re: Rebecca R.)

Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did unlawfully take money and personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Rebecca R.

COUNT 127

ZENNEY NGUYEN and SOURASITH SINGHARATH

IDENTITY THEFT (Re: Rebecca R.)

Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying information of Rebecca R. and used that information for an unlawful purpose and to obtain, and

1 attempt to obtain credit, goods, services, real property, and medical information without the
2 consent of Rebecca R.

3 **COUNT 128**

4 ZENNEY NGUYEN and SOURASITH SINGHARATH

5 **CONSPIRACY (Re: Mark R. #2)**

6 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
7 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN and
8 SOURASITH SINGHARATH, who did willfully and unlawfully conspire together with another
9 person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of
10 the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects
11 and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

12 **OVERT ACT 1**

13 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
14 Singharath possessed and transported the personal identifying information of Mark R. on multiple
15 electronic devices.

16 **COUNT 129**

17 ZENNEY NGUYEN and SOURASITH SINGHARATH

18 **GRAND THEFT (Re: Mark R. #2)**

19 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
20 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and SOURASITH
21 SINGHARATH, who did unlawfully take money and personal property of another of a value
22 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Mark R.

23 **COUNT 130**

24 ZENNEY NGUYEN and SOURASITH SINGHARATH

25 **IDENTITY THEFT (Re: Mark R. #2)**

26 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
27 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
28 SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal identifying

1 information of Mark R. and used that information for an unlawful purpose and to obtain, and
2 attempt to obtain credit, goods, services, real property, and medical information without the
3 consent of Mark R.

4 **COUNT 131**

5 ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
6 CAROLINE HAHN

7 **CONSPIRACY (Re: Van N.)**

8 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of CONSPIRACY, in
9 violation of Penal Code section 182(a)(1) a felony, was committed by ZENNEY NGUYEN,
10 SOURASITH SINGHARATH, MARCUS JACKSON and CAROLINE HAHN, who did willfully
11 and unlawfully conspire together with another person or persons whose identity is unknown to
12 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
13 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
14 Defendants committed the following overt act(s):

15 **OVERT ACT 1**

16 On September 6, 2017, in the County of Alameda, Zenney Nguyen and Sourasith
17 Singharath possessed and transported the personal identifying information of Van N. on multiple
18 electronic devices.

19 **OVERT ACT 2**

20 Around September 6, 2017, in the County of Alameda, Marcus Jackson conducted a peer to
21 peer transfer of funds to Caroline Hahn for the use of Van N.'s personal identifying information.

22 **COUNT 132**

23 ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
24 CAROLINE HAHN

25 **GRAND THEFT (Re: Van N.)**

26 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of THEFT in violation of
27 Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN, SOURASITH
28 SINGHARATH, MARCUS JACKSON and CAROLINE HAHN, who did unlawfully take money

1 and personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to
2 wit: Van N.

3 **COUNT 133**

4 ZENNEY NGUYEN, SOURASITH SINGHARATH, MARCUS JACKSON and
5 CAROLINE HAHN

6 **IDENTITY THEFT (Re: Van N.)**

7 Around July 1, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT in
8 violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN,
9 SOURASITH SINGHARATH, MARCUS JACKSON and CAROLINE HAHN, who did willfully
10 and unlawfully obtain personal identifying information of Van N. and used that information for
11 an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property,
12 and medical information without the consent of Van N.

13 **COUNT 134**

14 ZENNEY NGUYEN and SOURASITH SINGHARATH

15 **IDENTITY THEFT (Re: Bin Y. #2)**

16 Around September 6, 2017, in the COUNTY of ALAMEDA, the crime of IDENTITY
17 THEFT in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY
18 NGUYEN and SOURASITH SINGHARATH, who did willfully and unlawfully obtain personal
19 identifying information of Bin Y. and used that information for an unlawful purpose and to
20 obtain, and attempt to obtain credit, goods, services, real property, and medical information
21 without the consent of Bin Y.

22 **COUNT 135**

23 ZENNEY NGUYEN and CAROLINE HAHN

24 **IDENTITY THEFT (Re: Dariush J.)**

25 On November 30, 2016, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT
26 in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
27 CAROLINE HAHN, who did willfully and unlawfully obtain personal identifying information of
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1 Dariush J. and used that information for an unlawful purpose and to obtain, and attempt to obtain
2 credit, goods, services, real property, and medical information without the consent of Dariush J.

3 **COUNT 136**

4 ZENNEY NGUYEN and CAROLINE HAHN

5 **CONSPIRACY (Re: Brian M. / Wells Fargo)**

6 Around November 30, 2016, in the COUNTY of ALAMEDA, the crime of
7 CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by
8 ZENNEY NGUYEN and CAROLINE HAHN, who did willfully and unlawfully conspire
9 together with another person or persons whose identity is unknown to commit the crime of
10 GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose
11 of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the
12 following overt act(s):

13 **OVERT ACT 1**

14 On November 30, 2016, in the County of Alameda, Zenney Nguyen and Caroline Hahn
15 possessed and transported the personal identifying information of Brian M.

16 **OVERT ACT 2**

17 On November 30, 2016, in the County of Alameda, Zenney Nguyen and Caroline Hahn
18 walked into a Wells Fargo bank.

19 **OVERT ACT 3**

20 On November 30, 2016, in the County of Alameda, Zenney Nguyen presented an
21 identification card to a bank teller that had his picture but the personal identifying information of
22 Brian M.

23 **COUNT 137**

24 ZENNEY NGUYEN and CAROLINE HAHN

25 **BURGLARY (Re: Wells Fargo)**

26 On November 30, 2016, in the COUNTY of ALAMEDA, the crime of SECOND DEGREE
27 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
28 by ZENNEY NGUYEN and CAROLINE HAHN, who did enter a commercial building occupied

1 by Wells Fargo with the intent to commit larceny and any felony. It is further alleged that the
2 value of the property that they took and intended to take exceeded nine hundred fifty (\$950).

3 **COUNT 138**

4 ZENNEY NGUYEN and CAROLINE HAHN

5 **GRAND THEFT (Re: Brian M. / Wells Fargo)**

6 On November 30, 2016, in the COUNTY of ALAMEDA, the crime of THEFT in violation
7 of Penal Code section 487(a), a felony, was committed by ZENNEY NGUYEN and CAROLINE
8 HAHN, who did unlawfully take money and personal property of another of a value exceeding
9 Nine Hundred and Fifty Dollars (\$950) to wit: Brian M.

10 **COUNT 139**

11 ZENNEY NGUYEN and CAROLINE HAHN

12 **IDENTITY THEFT (Re: Brian M.)**

13 On November 30, 2016, in the COUNTY of ALAMEDA, the crime of IDENTITY THEFT
14 in violation of Penal Code section 530.5(a), a felony, was committed by ZENNEY NGUYEN and
15 CAROLINE HAHN, who did willfully and unlawfully obtain personal identifying information of
16 Brian M. and used that information for an unlawful purpose and to obtain, and attempt to obtain
17 credit, goods, services, real property, and medical information without the consent of Brian M.

18 **COUNT 140**

19 ZENNEY NGUYEN

20 **RESISTING, DELAYING OR OBSTRUCTING A PEACE OFFICER**

21 **(Re: Kelsey Gaudinier)**

22 On June 8 ,2018, ZENNEY NGUYEN willfully resisted, delayed, and/or obstructed Marco
23 Torres, a peace officer, in the discharge or attempted discharge of a duty of Marco Torres, his
24 office, or employment.

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COUNT 141

ZENNEY NGUYEN and SOURASITH SINGHARATH

MULTIPLE I.D. THEFT (Re: Multistate Electronic PII Document)

Around September 6, 2017, in the COUNTY of ALAMEDA, the crime of MULTIPLE IDENTIFYING INFORMATION THEFT in violation of Penal Code Section 530.5(c)(3), a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH who did willfully and unlawfully with an intent to defraud acquire and retain possession of the personal identifying information of 10 and more other persons. To wit: Multistate Electronic PII Document.

COUNT 142

ZENNEY NGUYEN and SOURASITH SINGHARATH

MULTIPLE I.D. THEFT (Re: Nine Page PII Document)

Around September 6, 2017, in the COUNTY of ALAMEDA, the crime of MULTIPLE IDENTIFYING INFORMATION THEFT in violation of Penal Code Section 530.5(c)(3), a felony, was committed by ZENNEY NGUYEN and SOURASITH SINGHARATH who did willfully and unlawfully with an intent to defraud acquire and retain possession of the personal identifying information of 10 and more other persons. To wit: Re: Nine Page PII Document.

SPECIAL ALLEGATIONS

AGGRAVATED WHITE-COLLAR CRIME, \$100,000 - \$500,000

It is further alleged that the following targets charged in the Indictment committed two or more related felonies to wit: Identity Theft, Burglary and Grand Theft; a material element of each of which is fraud, and embezzlement, involving a pattern of related felony conduct and the taking of more than one hundred thousand dollars (\$100,000), but not more than five hundred thousand dollars (\$500,000), within the meaning of California Penal Code section 186.11(a):

Suspect	Counts
Zenney Nguyen	1-142
Sourasith Singharath	1-4; 18; 24-134

1 **SPECIAL ALLEGATION PURSUANT TO PENAL CODE 781**

2 It is further alleged, pursuant to Penal Code section 781 that the above offenses charged in
3 counts 1- 142 were committed in part in Alameda County and in part in Contra Costa County.


4 **TOLLING OF THE STATUTE OF LIMITATIONS**

5 It is further alleged, as described in Penal Code section 803(c), that each of the above
6 conspiracy violations were not discovered until July 5, 2017, at the earliest, by law enforcement
7 in this case and the conspiracies had not been discovered by the Victims named in the conspiracy
8 counts either, until after that date. On July 5, 2017, the fraud scheme described in the conspiracy
9 counts was discovered by law enforcement investigating individual burglaries in Alameda
10 County. No victim of these violations and no law enforcement agency chargeable with the
11 investigation and prosecution of said violations had actual or constructive knowledge of said
12 scheme prior to July 5, 2017. Law enforcement believed these crimes were isolated incidents
13 until the discovery of the scheme on July 5, 2017.

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15 Dated: June 27, 2019
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19
20 A TRUE BILL.

21 
22 _____
23 Foreperson of the Grand Jury
24 County of Alameda, State of California

25 Dated: 6/27/19
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