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XAVIER BECERRA
Attorney General of California
JAMES ROOT
Senior Assistant Attorney General
RANDY MAILMAN
Deputy Attorney General
State Bar No. 246134
1300 I Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550
Telephone: (916) 210-7253
Fax: (916) 322-2368
E-mail: Randy.Mailman@doj.ca.gov
Attorneys for the People of the State of California

FILED / ENDORSED
AUG - 6 2018
By Cristin Chapo, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

TIMOTHY RYAN O'NEAL [REDACTED]

Defendant.

Case No. 16FE018308

deemed information

FIRST AMENDED FELONY COMPLAINT

The Attorney General of the State of California hereby accuses TIMOTHY RYAN O'NEAL of the following criminal offenses:

COUNT 1
(Failing to File Any Return with Intent To Evade Imposed Tax)

On or about April 15, 2013, in the County of SACRAMENTO, the crime of FAILURE TO FILE AN INCOME TAX RETURN, in violation of California Revenue and Taxation Code Section 19706, a felony, was committed by TIMOTHY RYAN O'NEAL, who did willfully and

1 unlawfully fail to file any return or to supply any information with the intent to evade imposed tax
2 for the 2012 tax year.

3 **COUNT 2**

4 **(Failing to File Any Return With Intent To Evade Imposed Tax)**

5 On or about April 15, 2014, in the County of SACRAMENTO, the crime of FAILURE TO
6 FILE AN INCOME TAX RETURN, in violation of California Revenue and Taxation Code
7 Section 19706, a felony, was committed by TIMOTHY RYAN O'NEAL, who did willfully and
8 unlawfully fail to file any return or to supply any information with the intent to evade imposed tax
9 for the 2013 tax year.

10 **COUNT 3**

11 **(Failing to File Any Return With Intent To Evade Imposed Tax)**

12 On or about April 15, 2015, in the County of SACRAMENTO, the crime of FAILURE TO
13 FILE AN INCOME TAX RETURN, in violation of California Revenue and Taxation Code
14 Section 19706, a felony, was committed by TIMOTHY RYAN O'NEAL, who did willfully and
15 unlawfully fail to file any return or to supply any information with the intent to evade imposed tax
16 for the 2014 tax year.

17 **COUNT 4**

18 **(Failing to File Any Return With Intent To Evade Imposed Tax)**

19 On or about April 15, 2016, in the County of SACRAMENTO, the crime of FAILURE TO
20 FILE AN INCOME TAX RETURN, in violation of California Revenue and Taxation Code
21 Section 19706, a felony, was committed by TIMOTHY RYAN O'NEAL, who did willfully and
22 unlawfully fail to file any return or to supply any information with the intent to evade imposed tax
23 for the 2015 tax year.

24 **SPECIAL ALLEGATION**

25 **(Prison Prior)**

26 It is further alleged as to counts 1 through 4 above, pursuant to Penal code section 667.5 (b)
27 that TIMOTHY RYAN O'NEAL, has suffered the following prior conviction: a 2004 conviction
28 in San Mateo County for a violation of Penal Code section 487 (a), Grand Theft, and that a term
was served as described in Penal Code section 667.5 for said offense and that TIMOTHY RYAN
O'NEAL did not remain free of prison custody for, and did commit an offense resulting in a

1 felony conviction, a period of five years subsequent to the conclusion of said term in that
2 TIMOTHY RYAN O'NEAL suffered the following additional felony convictions:

3 August 19, 2005, in Nevada County, Penal Code section 532, Obtaining Money by False
4 Pretenses, a felony;

5 August 19, 2005, in Nevada County, Penal Code section 487(a), Grand Theft, a felony;

6 May 4, 2010, in El Dorado County, Penal Code section 518, Extortion, a felony;

7 May 4, 2010, in El Dorado County, Penal Code section 518, Extortion, a felony; and

8 May 4, 2010, in El Dorado County, Penal Code section 518, Extortion, a felony.

9 * * * * *

10 Pursuant to Penal Code Section 1054.5, subdivision (b), the People of the State of
11 California hereby informally request that defense counsel provide to the People of the State of
12 California all discovery as required by Penal Code Section 1054.3.

13 **DECLARATION**

14 I verify under information and belief, pursuant to Penal Code section 806, that the forgoing
15 is true and correct.

16 Dated: May 10, 2018

17 Respectfully Submitted,

18 XAVIER BECERRA
19 Attorney General of California

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21 RANDY M. MAILMAN
22 Deputy Attorney General
23 *Attorneys for the People of the State of
24 California*

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HOLDING ORDER

It appearing to me that the offenses in the within complaint have been committed, and that there is sufficient cause to believe that the defendant, TIMOTHY RYAN ONEAL, is guilty thereof,
_____ The defendant, TIMOTHY RYAN ONEAL, having waived preliminary hearing to the offenses set forth in this complaint,

Exceptions/Additions/Conditions: _____

I order that the defendant be held to answer to same. In my capacity as Judge of the Superior Court, I deem the within complaint to be an Information and order it filed in the Superior Court.

Date: August 6, 2018 Dept: 37

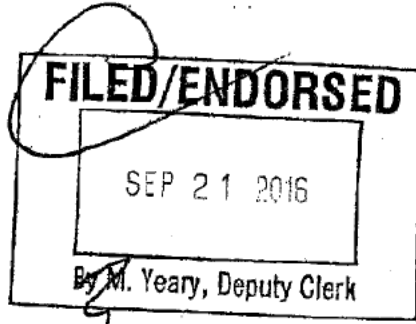


Jennifer K. Rockwell

JENNIFER K. ROCKWELL



1 KAMALA D. HARRIS
 Attorney General of California
 2 MAGGY KRELL
 Supervising Deputy Attorney General
 3 RICHARD J. CUTLER
 Deputy Attorney General
 4 State Bar No. 146180
 1300 I Street/9th Floor
 5 Sacramento, CA 95819
 Telephone: (916) 324-0027
 6 Fax: (916) 322-2368
 E-mail: richard.cutler@doj.ca.gov
 7 Attorneys for the People of the State of California



8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 9 COUNTY OF SACRAMENTO

11 THE PEOPLE OF THE STATE OF
 12 CALIFORNIA,

Case No. 16FEO18308

13 Plaintiff,

14 v.

16 ~~2.~~ TIMOTHY RYAN O'NEAL ([REDACTED])
 17 ~~1.~~ BARBARA SUZANNE O'NEAL ([REDACTED])
 18 *50,000*
10,000

FELONY COMPLAINT

21 Defendants.

22 The undersigned is informed and believes that:

23 **COUNT 1**
 24 **Making, Rendering, Signing, or Verifying Any False or Fraudulent Information With**
 25 **Intent to Evade Imposed Tax**
 26 **(California Revenue and Taxation Code section 19706)**

27 On or about April 15, 2013, in the County of SACRAMENTO, the crime of **FILING A**
 28 **FALSE TAX RETURN**, in violation of California Revenue and Taxation Code Section 19706, a
 felony, was committed by **BARBARA SUZANNE O'NEAL** who did willfully and unlawfully

1 make, render, sign, or verify any false or fraudulent information, with the intent to evade imposed
2 tax for the 2012 tax year.

3 **COUNT 2**
4 **Failing to File Any Return With Intent To Evade Imposed Tax**
5 **(California Revenue and Taxation Code section 19706)**

6 On or about April 15, 2013, in the County of SACRAMENTO, the crime of FAILURE
7 TO FILE AN INCOME TAX RETURN, in violation of California Revenue and Taxation Code
8 Section 19706, a felony, was committed by TIMOTHY RYAN O'NEAL, who did willfully and
9 unlawfully fail to file any return or to supply any information with the intent to evade imposed tax
10 for the 2012 tax year.

11 **COUNT 3**
12 **Failing to File Any Return With Intent To Evade Imposed Tax**
13 **(California Revenue and Taxation Code section 19706)**

14 On or about April 15, 2014, in the County of SACRAMENTO, the crime of FAILURE
15 TO FILE AN INCOME TAX RETURN, in violation of California Revenue and Taxation Code
16 Section 19706, a felony, was committed by TIMOTHY RYAN O'NEAL, who did willfully and
17 unlawfully fail to file any return or to supply any information with the intent to evade imposed tax
18 for the 2013 tax year.

19 **COUNT 4**
20 **Failing to File Any Return With Intent To Evade Imposed Tax**
21 **(California Revenue and Taxation Code section 19706)**

22 On or about April 15, 2014, in the County of SACRAMENTO, the crime of FAILURE
23 TO FILE AN INCOME TAX RETURN, in violation of California Revenue and Taxation Code
24 Section 19706, a felony, was committed by BARBARA SUZANNE O'NEAL, who did willfully
25 and unlawfully fail to file any return or to supply any information with the intent to evade
26 imposed tax for the 2013 tax year.

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COUNT 5
Failing to File Any Return With Intent To Evade Imposed Tax
(California Revenue and Taxation Code section 19706)

On or about April 15, 2015, in the County of SACRAMENTO, the crime of FAILURE TO FILE AN INCOME TAX RETURN, in violation of California Revenue and Taxation Code Section 19706, a felony, was committed by TIMOTHY RYAN O'NEAL, who did willfully and unlawfully fail to file any return or to supply any information with the intent to evade imposed tax for the 2014 tax year.

COUNT 6
Failing to File Any Return With Intent To Evade Imposed Tax
(California Revenue and Taxation Code section 19706)

On or about April 15, 2015, in the County of SACRAMENTO, the crime of FAILURE TO FILE AN INCOME TAX RETURN, in violation of California Revenue and Taxation Code Section 19706, a felony, was committed by BARBARA SUZANNE O'NEAL, who did willfully and unlawfully fail to file any return or to supply any information with the intent to evade imposed tax for the 2014 tax year.

COUNT 7
Failing to File Any Return With Intent To Evade Imposed Tax
(California Revenue and Taxation Code section 19706)

On or about April 15, 2016, in the County of SACRAMENTO, the crime of FAILURE TO FILE AN INCOME TAX RETURN, in violation of California Revenue and Taxation Code Section 19706, a felony, was committed by TIMOTHY RYAN O'NEAL, who did willfully and unlawfully fail to file any return or to supply any information with the intent to evade imposed tax for the 2015 tax year.

COUNT 8
Failing to File Any Return With Intent To Evade Imposed Tax
(California Revenue and Taxation Code section 19706)

On or about April 15, 2016, in the County of SACRAMENTO, the crime of FAILURE TO FILE AN INCOME TAX RETURN, in violation of California Revenue and Taxation Code

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Section 19706, a felony, was committed by **BARBARA SUZANNE O'NEAL**, who did willfully and unlawfully fail to file any return or to supply any information with the intent to evade imposed tax for the 2015 tax year.

Executed on September 20, 2016, County of Sacramento, California.

Respectfully Submitted,

KAMALA D. HARRIS
Attorney General of California



RICHARD J. CUTLER
Deputy Attorney General
Attorneys for People