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FILED  
2020 MAY 15 AM 9:17  
CENTRAL CRIMINAL COURT  
LOS ANGELES SUPERIOR COURT

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 IN AND FOR THE COUNTY OF LOS ANGELES

13 **PEOPLE OF THE STATE OF CALIFORNIA,**  
14  
15 Plaintiff,  
16  
17 **DEREK RYAN STRADLEY**  
*(DOB: [REDACTED])*  
18 **JUSTIN ROYCE STRADLEY**  
*(DOB: [REDACTED]),*  
19  
20 Defendants.

Case No. BA484107  
**FELONY COMPLAINT**

21 The Attorney General of the State of California, through Deputy Attorney General Vikram  
22 Mandla, by this Felony Complaint, accuses defendants **DEREK RYAN STRADLEY** and  
23 **JUSTIN ROYCE STRADLEY** of the following crimes:

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1 **COUNT ONE**

2 **[FALSE SALES TAX RETURN]**

3 On or about October 31, 2016 through January 31, 2017, at and in the County of Los  
4 Angeles, State of California, defendants **DEREK RYAN STRADLEY** and **JUSTIN ROYCE**  
5 **STRADLEY**, being a person required to make, render, sign or verify a sales tax return for sellers  
6 permit number SR SO 102-754110, unlawfully filed false or fraudulent sales tax returns for the  
7 period July 1, 2016 through December 31, 2016, with the intent to defeat or evade the reporting,  
8 assessment or payment of a tax liability equal to or greater than twenty-five thousand dollars  
9 (\$25,000), within any 12-consecutive-month period, in violation of Revenue and Taxation Code  
10 sections 7152(a)/7153.5, a **felony**, in that the defendants failed to report, asses and pay sales tax  
11 to the California Department of Tax and fee Administration, to wit: \$54,187 sales tax owed by  
12 P.L.A.C.T. BROS., LLC.

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14 **COUNT TWO**

15 **[FAILURE TO FILE SALES TAX RETURN]**

16 For a further and separate cause of action, being a different offense from but connected in  
17 its commission as the charges set forth in Count One: On or about April 30, 2017 through  
18 January 31, 2018, at and in the County of Los Angeles, State of California, defendants **DEREK**  
19 **RYAN STRADLEY** and **JUSTIN ROYCE STRADLEY**, being a person required to furnish a  
20 sales tax return, failed or refused to furnish any sales tax returns for the period January 1, 2017  
21 through December 31, 2017, with the intent to defeat or evade the reporting, assessment or  
22 payment of a tax liability equal to or greater than twenty-five thousand dollars (\$25,000), within  
23 any 12-consecutive-month period, in violation of Revenue and Taxation Code sections  
24 6452(c)/7153.5, a **felony**, in that the defendants failed to report, asses and pay sales tax to the  
25 California Department of Tax and fee Administration, to wit: \$113,877.65 sales tax owed by  
26 P.L.A.C.T. BROS., LLC.

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**COUNT THREE**

**[FAILURE TO FILE SALES TAX RETURN]**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Two: On or about April 30, 2018 through January 31, 2019, at and in the County of Los Angeles, State of California, defendants **DEREK RYAN STRADLEY** and **JUSTIN ROYCE STRADLEY**, being a person required to furnish a sales tax return, failed or refused to furnish any sales tax returns for the period January 1, 2018 through December 31, 2018, with the intent to defeat or evade the reporting, assessment or payment of a tax liability equal to or greater than twenty-five thousand dollars (\$25,000), within any 12-consecutive-month period, in violation of Revenue and Taxation Code sections 6452(c)/7153.5, a **felony**, in that the defendants failed to report, asses and pay sales tax to the California Department of Tax and fee Administration, to wit: \$117,193.56 sales tax owed by P.L.A.C.T. BROS., LLC.

**COUNT FOUR**

**[FAILURE TO FILE SALES TAX RETURN]**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Three: On or about April 30, 2019 through October 31, 2019, at and in the County of Los Angeles, State of California, defendants **DEREK RYAN STRADLEY** and **JUSTIN ROYCE STRADLEY**, being a person required to furnish a sales tax return, failed or refused to furnish any sales tax returns for the period January 1, 2019 through September 30, 2019, with the intent to defeat or evade the reporting, assessment or payment of a tax liability equal to or greater than twenty-five thousand dollars (\$25,000), within any 12-consecutive-month period, in violation of Revenue and Taxation Code sections 6452(c)/7153.5, a **felony**, in that the defendants failed to report, asses and pay sales tax to the California Department of Tax and fee Administration, to wit: \$86,433.72 sales tax owed by P.L.A.C.T. BROS., LLC.

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**COUNT FIVE**

**[FALSE INCOME TAX RETURN]**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Four: On or about September 9, 2019, at and in the County of Los Angeles, State of California, defendants **DEREK RYAN STRADLEY** and **JUSTIN ROYCE STRADLEY**, willfully subscribed and filed a false tax return, in violation of Revenue and Taxation Code section 19706, a **felony**, to wit: 2018 Limited Liability Company Return of Income for P.L.A.C.T. BROS., LLC.

**COUNT SIX**

**[FALSE INCOME TAX RETURN]**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Five: On or about April 12, 2018, at and in the County of Los Angeles, State of California, defendant **DEREK RYAN STRADLEY** willfully subscribed and filed a false tax return, in violation of Revenue and Taxation Code section 19706, a **felony**, to wit: 2017 California Resident Income Tax Return.

**COUNT SEVEN**

**[FALSE INCOME TAX RETURN]**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Six: On or about September 5, 2019, at and in the County of Los Angeles, State of California, defendant **DEREK RYAN STRADLEY** willfully subscribed and filed a false tax return, in violation of Revenue and Taxation Code section 19706, a **felony**, to wit: 2018 California Resident Income Tax Return.

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**COUNT EIGHT**

**[FALSE INCOME TAX RETURN]**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Seven: On or about April 9, 2018, at and in the County of Los Angeles, State of California, defendant **JUSTIN ROYCE STRADLEY** willfully subscribed and filed a false tax return, in violation of Revenue and Taxation Code section 19706, a **felony**, to wit: **2017** California Resident Income Tax Return.

**COUNT NINE**

**[FALSE INCOME TAX RETURN]**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Eight: On or about September 5, 2019, at and in the County of Los Angeles, State of California, defendant **JUSTIN ROYCE STRADLEY** willfully subscribed and filed a false tax return, in violation of Revenue and Taxation Code section 19706, a **felony**, to wit: **2018** California Resident Income Tax Return.

**SPECIAL ALLEGATION ONE**

**[WHITE COLLAR CRIME ENHANCEMENT IN EXCESS OF \$500,000]**

It is further alleged, pursuant to Penal Code Section 186.11(a)(2), that the offenses set forth in Counts One through Nine, are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000) by defendants **DEREK RYAN STRADLEY** and **JUSTIN ROYCE STRADLEY**.

NOTICE: A conviction of this offense excludes the defendant from a sentence of imprisonment in the county jail pursuant to Penal Code section 1170(h).

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1 **SPECIAL ALLEGATION TWO**

2 **[STATUTE OF LIMITATIONS – DISCOVERY WITHIN TWO YEARS]**

3 It is further alleged pursuant to Revenue and Taxation Code section 7154, that the  
4 offenses set forth in Counts One through Four were not discovered until at least October 2, 2019,  
5 when California Department of Tax and Fee Administration (“CDTFA”) Senior Investigator  
6 David Padilla (“SI Padilla”) and California Franchise Tax Board (“FTB”) Special Agent Maribel  
7 Davila assisted in a search warrant executed at the business location for P.L.A.C.T BROS., LLC,  
8 during which evidence of unreported sales and income was discovered. Subsequently, SI Padilla  
9 initiated a criminal sales tax evasion investigation of P.L.A.C.T. BROS., LLC, **DEREK RYAN**  
10 **STRADLEY** and **JUSTIN ROYCE STRADLEY**.

11 In conclusion, prior to October 2, 2019, the CDTFA did not have actual or constructive  
12 knowledge about the nature or extent of the omission or concealment of sales by P.L.A.C.T.  
13 BROS., LLC, **DEREK RYAN STRADLEY** and **JUSTIN ROYCE STRADLEY**.

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15 **SPECIAL ALLEGATION THREE**

16 **[STATUTE OF LIMITATIONS – DISCOVERY WITHIN SIX YEARS OF COMMISSION]**

17 It is further alleged pursuant to Revenue and Taxation Code section 19704, that the  
18 offenses set forth in Counts Five through Nine were not committed until at least April 9, 2018.  
19 On or about October 2, 2019, FTB Special Agent Ryan Huber (“SA Huber”) initiated a criminal  
20 income tax evasion investigation of P.L.A.C.T. BROS., LLC, **DEREK RYAN STRADLEY** and  
21 **JUSTIN ROYCE STRADLEY**. Based on his investigation, SA Huber determined that  
22 P.L.A.C.T. BROS., LLC filed a false Limited Liability Company Return of Income on September  
23 9, 2019; **DEREK RYAN STRADLEY** filed false California Resident Income Tax Returns on  
24 April 12, 2018 and September 5, 2019; and **JUSTIN ROYCE STRADLEY** filed false California  
25 Resident Income Tax Returns on April 9, 2018 and September 5, 2019.

26 In conclusion, the filing of false income tax returns charged in Counts Four through Nine  
27 were not committed until the false California Resident Income Tax Returns were filed on April 9,

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1 2018, April 12, 2018 and September 5, 2019, and the false Limited Liability Company Return of  
2 Income was filed on September 9, 2019.

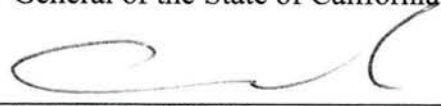
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**DECLARATION**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: 5/15/2020

XAVIER BECERRA  
Attorney General of the State of California

By:   
VIKRAM MANDLA  
Deputy Attorney General  
*Attorneys for the People of the State of California*