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**WARRANT ISSUED**

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*Attorneys for the People of the State of California*

2021 DEC 10 PM 2:11  
LOS ANGELES COUNTY  
DISTRICT ATTORNEY  
EXTRADITION SERVICES, P/C

*BO*  
Vikram Mandla  
Deputy Attorney General

2021 DEC -7 AM 8:55

**Filed**

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

**THE PEOPLE OF THE STATE OF CALIFORNIA,**  
  
v.  
**SADIQ MOHAMMED** [REDACTED]

Case No. BA498250

Plaintiff,

**FELONY COMPLAINT FOR ARREST WARRANT AND EXTRADITION**

Defendant.

The Attorney General of the State of California, through Deputy Attorney General Vikram Mandla accuses defendant SADIQ MOHAMMED of the following crimes which are connected to each other in their commission:

**COUNT ONE**  
**[FALSE TAX RETURN]**

On or about January 26, 2018, at and in the County of Los Angeles, State of California, defendant SADIQ MOHAMMED, being a person required to make, render, sign or verify a tax

1 return for tobacco distributor license number 050-005851, unlawfully filed a false or fraudulent  
2 tax return for the period December 1, 2017 through December 31, 2017, with the intent to defeat  
3 or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any  
4 12-consecutive month period, in violation of Revenue and Taxation Code Sections 30472 and  
5 30480, a felony, to wit: Failure to pay \$60,910.58 excise tax to the California Department of Tax  
6 and Fee Administration.

7  
8 **COUNT TWO**

9 **[FALSE TAX RETURN]**

10 On or about February 20, 2018, at and in the County of Los Angeles, State of California,  
11 defendant SADIQ MOHAMMED, being a person required to make, render, sign or verify a tax  
12 return for tobacco distributor license number 050-005851, unlawfully filed a false or fraudulent  
13 tax return for the period January 1, 2018 through January 31, 2018, with the intent to defeat or  
14 evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-  
15 consecutive month period, in violation of Revenue and Taxation Code Sections 30472 and 30480,  
16 a felony, to wit: Failure to pay \$250,717.45 excise tax to the California Department of Tax and  
17 Fee Administration.

18  
19 **COUNT THREE**

20 **[FALSE TAX RETURN]**

21 On or about March 14, 2018, at and in the County of Los Angeles, State of California,  
22 defendant SADIQ MOHAMMED, being a person required to make, render, sign or verify a tax  
23 return for tobacco distributor license number 050-005851, unlawfully filed a false or fraudulent  
24 tax return for the period February 1, 2018 through February 28, 2018, with the intent to defeat or  
25 evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-  
26 consecutive month period, in violation of Revenue and Taxation Code Sections 30472 and 30480,  
27 a felony, to wit: Failure to pay \$294,246.72 excise tax to the California Department of Tax and  
28 Fee Administration.

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**COUNT FOUR**

**[FALSE TAX RETURN]**

On or about April 20, 2018, at and in the County of Los Angeles, State of California, defendant SADIQ MOHAMMED, being a person required to make, render, sign or verify a tax return for tobacco distributor license number 050-005851, unlawfully filed a false or fraudulent tax return for the period March 1, 2018 through March 31, 2018, with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation Code Sections 30472 and 30480, a felony, to wit: Failure to pay \$368,321.25 excise tax to the California Department of Tax and Fee Administration.

**COUNT FIVE**

**[FALSE TAX RETURN]**

On or about May 21, 2018, at and in the County of Los Angeles, State of California, defendant SADIQ MOHAMMED, being a person required to make, render, sign or verify a tax return for tobacco distributor license number 050-005851, unlawfully filed a false or fraudulent tax return for the period April 1, 2018 through April 30, 2018, with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation Code Sections 30472 and 30480, a felony, to wit: Failure to pay \$201,755.97 excise tax to the California Department of Tax and Fee Administration.

**COUNT SIX**

**[FALSE TAX RETURN]**

On or about June 21, 2018, at and in the County of Los Angeles, State of California, defendant SADIQ MOHAMMED, being a person required to make, render, sign or verify a tax return for tobacco distributor license number 050-005851, unlawfully filed a false or fraudulent tax return for the period May 1, 2018 through May 31, 2018, with the intent to defeat or evade an

1 unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-  
2 consecutive month period, in violation of Revenue and Taxation Code Sections 30472 and 30480,  
3 a felony, to wit: Failure to pay \$34,223.18 excise tax to the California Department of Tax and Fee  
4 Administration.

5  
6 **COUNT SEVEN**

7 **[FALSE TAX RETURN]**

8 On or about September 18, 2018, at and in the County of Los Angeles, State of California,  
9 defendant SADIQ MOHAMMED, being a person required to make, render, sign or verify a tax  
10 return for tobacco distributor license number 050-005851, unlawfully filed a false or fraudulent  
11 tax return for the period August 1, 2018 through August 31, 2018, with the intent to defeat or  
12 evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-  
13 consecutive month period, in violation of Revenue and Taxation Code Sections 30472 and 30480,  
14 a felony, to wit: Failure to pay \$223,099.25 excise tax to the California Department of Tax and  
15 Fee Administration.

16  
17 **COUNT EIGHT**

18 **[FALSE TAX RETURN]**

19 On or about October 20, 2018, at and in the County of Los Angeles, State of California,  
20 defendant SADIQ MOHAMMED, being a person required to make, render, sign or verify a tax  
21 return for tobacco distributor license number 050-005851, unlawfully filed a false or fraudulent  
22 tax return for the period September 1, 2018 through September 30, 2018, with the intent to defeat  
23 or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any  
24 12-consecutive month period, in violation of Revenue and Taxation Code Sections 30472 and  
25 30480, a felony, to wit: Failure to pay \$243,961.67 excise tax to the California Department of Tax  
26 and Fee Administration.

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**COUNT NINE**

**[FALSE TAX RETURN]**

On or about November 23, 2018, at and in the County of Los Angeles, State of California, defendant SADIQ MOHAMMED, being a person required to make, render, sign or verify a tax return for tobacco distributor license number 050-005851, unlawfully filed a false or fraudulent tax return for the period October 1, 2018 through October 31, 2018, with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation Code Sections 30472 and 30480, a felony, to wit: Failure to pay \$519,819.47 excise tax to the California Department of Tax and Fee Administration.

**COUNT TEN**

**[FALSE TAX RETURN]**

On or about December 24, 2018, at and in the County of Los Angeles, State of California, defendant SADIQ MOHAMMED, being a person required to make, render, sign or verify a tax return for tobacco distributor license number 050-005851, unlawfully filed a false or fraudulent tax return for the period November 1, 2018 through November 30, 2018, with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation Code Sections 30472 and 30480, a felony, to wit: Failure to pay \$431,142.50 excise tax to the California Department of Tax and Fee Administration.

**COUNT ELEVEN**

**[FALSE TAX RETURN]**

On or about January 21, 2019, at and in the County of Los Angeles, State of California, defendant SADIQ MOHAMMED, being a person required to make, render, sign or verify a tax return for tobacco distributor license number 050-005851, unlawfully filed a false or fraudulent tax return for the period December 1, 2018 through December 31, 2018, with the intent to defeat

1 or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any  
2 12-consecutive month period, in violation of Revenue and Taxation Code Sections 30472 and  
3 30480, a felony, to wit: Failure to pay \$428,611.14 excise tax to the California Department of Tax  
4 and Fee Administration.

5  
6 **COUNT TWELVE**

7 **[MONEY LAUNDERING]**

8 On or about March 1, 2018 through March 31, 2018, at and in the counties of Los Angeles  
9 and San Bernardino, State of California, defendant SADIQ MOHAMMED did unlawfully  
10 conduct or caused to be conducted transactions involving monetary instruments of a value  
11 exceeding \$25,000, through a financial institution with the intent to promote, manage, establish,  
12 and carry on criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to wit:  
13 \$238,638 deposited into an account at Wells Fargo Bank, N.A., knowing that the monetary  
14 instruments represented the proceeds of, and was derived directly or indirectly from the proceeds  
15 of criminal activity. It is further alleged that Los Angeles County has jurisdiction pursuant to  
16 Penal Code section 781.

17  
18 **COUNT THIRTEEN**

19 **[MONEY LAUNDERING]**

20 On or about April 1, 2018 through April 30, 2018, at and in the counties of San Francisco,  
21 San Bernardino and San Diego, State of California, defendant SADIQ MOHAMMED did  
22 unlawfully conduct or caused to be conducted transactions involving monetary instruments of a  
23 value exceeding \$25,000, through a financial institution with the intent to promote, manage,  
24 establish, and carry on criminal activity in violation of Penal Code Section 186.10(a)(1), a felony,  
25 to wit: \$190,182 deposited into an account at Wells Fargo Bank, N.A., knowing that the monetary  
26 instruments represented the proceeds of, and was derived directly or indirectly from the proceeds  
27 of criminal activity. It is further alleged that Los Angeles County has jurisdiction pursuant to  
28 Penal Code section 781.

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**COUNT FOURTEEN**

**[MONEY LAUNDERING]**

On or about May 1, 2018 through May 31, 2-18, at and in the counties of San Francisco and San Diego, State of California, defendant SADIQ MOHAMMED did unlawfully conduct or caused to be conducted transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution with the intent to promote, manage, establish, and carry on criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$69,201.65 deposited into an account at Wells Fargo Bank, N.A., knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of criminal activity. It is further alleged that Los Angeles County has jurisdiction pursuant to Penal Code section 781.

**COUNT FIFTEEN**

**[MONEY LAUNDERING]**

On or about August 1, 2018 through August 31, 2018, at and in the county of Los Angeles, State of California, defendant SADIQ MOHAMMED did unlawfully conduct or caused to be conducted transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution with the intent to promote, manage, establish, and carry on criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$41,740 deposited into an account at Wells Fargo Bank, N.A., knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of criminal activity.

**COUNT SIXTEEN**

**[MONEY LAUNDERING]**

On or about September 1, 2018 through September 30, 2018, at and in the county of Los Angeles, State of California, defendant SADIQ MOHAMMED did unlawfully conduct or caused to be conducted transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution with the intent to promote, manage, establish, and carry on criminal

1 activity in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$70,780 deposited into  
2 an account at Wells Fargo Bank, N.A., knowing that the monetary instruments represented the  
3 proceeds of, and was derived directly or indirectly from the proceeds of criminal activity.  
4

5 **COUNT SEVENTEEN**  
6 **[MONEY LAUNDERING]**

7 On or about October 1, 2018 through October 31, 2018, at and in the counties of Los  
8 Angeles and San Bernardino, State of California, defendant SADIQ MOHAMMED did  
9 unlawfully conduct or caused to be conducted transactions involving monetary instruments of a  
10 value exceeding \$25,000, through a financial institution with the intent to promote, manage,  
11 establish, and carry on criminal activity in violation of Penal Code Section 186.10(a)(1), a felony,  
12 to wit: \$624,009 deposited into an account at Wells Fargo Bank, N.A., knowing that the monetary  
13 instruments represented the proceeds of, and was derived directly or indirectly from the proceeds  
14 of criminal activity. It is further alleged that Los Angeles County has jurisdiction pursuant to  
15 Penal Code section 781.  
16

17 **COUNT EIGHTEEN**  
18 **[MONEY LAUNDERING]**

19 On or about November 1, 2018 through November 30, 2018, at and in the county of Los  
20 Angeles, State of California, defendant SADIQ MOHAMMED did unlawfully conduct or caused  
21 to be conducted transactions involving monetary instruments of a value exceeding \$25,000,  
22 through a financial institution with the intent to promote, manage, establish, and carry on criminal  
23 activity in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$506,105 deposited into  
24 an account at Wells Fargo Bank, N.A., knowing that the monetary instruments represented the  
25 proceeds of, and was derived directly or indirectly from the proceeds of criminal activity.

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**COUNT NINETEEN**

**[MONEY LAUNDERING]**

On or about December 1, 2018 through December 31, 2018, at and in the county of Los Angeles, State of California, defendant SADIQ MOHAMMED did unlawfully conduct or caused to be conducted transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution with the intent to promote, manage, establish, and carry on criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$165,875.25 deposited into an account at Wells Fargo Bank, N.A., knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of criminal activity.

**COUNT TWENTY**

**[MONEY LAUNDERING]**

On or about September 1, 2019 through September 30, 2019, at and in the county of Los Angeles, State of California, defendant SADIQ MOHAMMED did unlawfully conduct or caused to be conducted transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution with the intent to promote, manage, establish, and carry on criminal activity in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$89,000 deposited into an account at Wells Fargo Bank, N.A., knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of criminal activity.

**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 Twenty 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).

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).

1 **SPECIAL ALLEGATION TWO**

2 **[MONEY LAUNDERING ENHANCEMENT]**

3 It is further alleged, pursuant to Penal Code Section 186.10(c)(1)(C), that the value of the  
4 individually alleged transactions in Counts Twelve through Twenty exceeds one million dollars  
5 (\$1,000,000), but is less than two million five hundred thousand dollars (\$2,500,000), so that the  
6 court, in addition to and consecutive to the felony punishment otherwise imposed pursuant to this  
7 section, shall impose an additional term of imprisonment of three years.

8  
9 **SPECIAL ALLEGATION THREE**

10 **[STATUTE OF LIMITATIONS – PROSECUTION WITHIN SIX YEARS]**

11 It is further alleged, pursuant to Revenue and Taxation Code Section 30481, that  
12 prosecution for the offenses set forth in Counts One through Eleven have been instituted within  
13 six years after commission of the offenses.

14 On June 5, 2019, investigators from the California Department of Tax and Fee  
15 Administration determined that beginning January 26, 2018 and continuing through January 21,  
16 2019, defendant SADIQ MOHAMMED filed or caused to be filed one or more false Tobacco  
17 Products Distributor Tax Return, in which he failed to report all tobacco distributions in, and  
18 evaded the payment of a tax liability exceeding twenty-five thousand dollars (\$25,000).

19 The offenses charged in Counts One through Eleven have been instituted within six years  
20 after commission of the offense.

21  
22 **SPECIAL ALLEGATION FOUR**

23 **[STATUTE OF LIMITATIONS – DISCOVERY WITHIN FOUR YEARS]**

24 It is alleged pursuant to Penal Code section 801.5, that prosecution for the offenses  
25 alleged in Counts Twelve through Twenty is four years after the discovery of the commission of  
26 the offense. It is also alleged pursuant to Penal Code section 803(c), that the offenses set forth in  
27 Counts Twelve through Twenty were not discovered until at least February 7, 2019, when the  
28 California Department of Justice, and the California Department of Tax and Fee Administration

1 served a search warrant at the residence of [REDACTED]. Located during the search of the  
2 residence were cashier checks payable to L.A. Trading and Distribution, Inc. The ongoing  
3 investigation revealed that defendant SADIQ MOHAMMED was the owner of L.A. Trading and  
4 Distribution, Inc.

5 On October 7, 2019, investigators from the California Department of Justice served a  
6 search warrant at Wells Fargo Bank, for records related to defendant SADIQ MOHAMMED and  
7 L.A. Trading and Distribution, Inc. On November 19, 2019, Wells Fargo Bank provided records  
8 related to defendant SADIQ MOHAMMED and L.A. Trading and Distribution, Inc. A  
9 subsequent review of the bank records revealed that defendant SADIQ MOHAMMED deposited  
10 or directed the deposit of proceeds from the sale of untaxed tobacco into one or more accounts,  
11 and then used the deposited funds to pay for additional purchases of untaxed tobacco, all while  
12 failing to report the sale of tobacco to California authorities in order to evade the payment of  
13 excise tax.

14 Prior to receipt of the bank records on February 7, 2019, the investigators had no actual or  
15 constructive knowledge that one or more bank accounts was being used to facilitate the  
16 movement of illicitly obtained funds.


17  
18 **DECLARATION**

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

21 Date: 12/7/21

Respectfully Submitted,

22  
23 ROB BONTA  
Attorney General of the State of California

24   
25 VIKRAM MANDLA  
26 Deputy Attorney General  
27 *Attorneys for the People of the State of*  
28 *California*