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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 IN AND FOR THE COUNTY OF SACRAMENTO

13 **PEOPLE OF THE STATE OF CALIFORNIA,**

14 Plaintiff,

15 v.

16 **1. ALITAVAF**

[Redacted]

18 **2. ABEDALAZIZ SALEEM**

[Redacted]

19 **3. ISMAIL KARAJAH**

[Redacted]

20 Defendants.
21

Case No.

**FELONY COMPLAINT FOR
ARREST WARRANT**

22 The Attorney General of the State of California, through Deputy Attorney General Vikram
 23 Mandla, by this complaint, accuses defendants ALI TAVAF, ABEDALAZIZ SALEEM and
 24 ISMAIL KARAJAH of the following crimes, which are connected to each other in their
 25 commission:

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COUNT ONE

[CONSPIRACY TO FILE FALSE TAX RETURNS]

On or about and between May 9, 2020 and February 25, 2022, defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL KARAJAH committed the crime of conspiracy, in violation of Penal Code Section 182(a)(1), in that they unlawfully conspired together, and with other uncharged person or persons, to commit the crime of filing false tax returns in violation of Revenue and Taxation Code sections 30472 and 30480, a felony. It is further alleged that Sacramento County has jurisdiction in this count pursuant to Penal Code section 781, and that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act(s):

OVERT ACT 1

On or about May 9, 2020, in the County of San Francisco, defendant ABEDALAZIZ SALEEM signed Articles of Incorporation for Aztec Tobacco Distributors, Inc.

OVERT ACT 2

On or about June 16, 2020, in the County of San Francisco, defendant ABEDALAZIZ SALEEM signed a Wells Fargo Bank Business Account Application for Aztec Tobacco Distributors, Inc.

OVERT ACT 3

On or about and between August 5, 2020 and March 26, 2021, in the County of Los Angeles, defendant ALI TAVAF ordered tobacco products from Mansoor Malik, the owner of Eclipse Wholesale, Inc..

OVERT ACT 4

On or about August 6, 2020, in the County of San Francisco, defendant ISMAIL KARAJAH sent defendants ALI TAVAF and ABEDALAZIZ SALEEM the bank account number and routing number for Eclipse Wholesale, Inc.

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OVERT ACT 5

On or about August 31, 2020, in the County of Los Angeles, defendant ALI TAVAF told defendants ABEDALAZIZ SALEEM and ISMAIL KARAJAH, “Let’s do the wire for Mansour before noon today.”

OVERT ACT 6

On or about August 31, 2020, in the County of San Francisco, defendant ABEDALAZIZ SALEEM sent defendants ALI TAVAF and ISMAIL KARAJAH a purchase invoice from Eclipse Wholesale, Inc.

OVERT ACT 7

On or about September 3, 2020, in the County of Los Angeles, defendant ALI TAVAF sent defendants ABEDALAZIZ SALEEM and ISMAIL KARAJAH a list of tobacco products.

OVERT ACT 8

On or about September 3, 2020, in the County of Los Angeles, defendant ALI TAVAF told defendant ISMAIL KARAJAH to take care of the wire tomorrow.

OVERT ACT 9

On or about and between September 3, 2020 and March 27, 2021, in the County of Los Angeles, defendant ALI TAVAF sold tobacco products to Nader Fararji.

OVERT ACT 10

On or about September 3, 2020, in the County of Los Angeles, defendant ISMAIL KARAJAH sent defendants ALI TAVAF and ABEDALAZIZ SALEEM an image of a blank check for Aztec Tobacco Distributors, Inc.

OVERT ACT 11

On or about and between September 9, 2020 and January 13, 2021, in the County of Los Angeles, defendant ALI TAVAF told Nader Fararji to wire payments to Aztec Tobacco Distributors, Inc.

OVERT ACT 12

On or about September 13, 2020, in the County of Los Angeles, defendant ALI TAVAF asked defendants ABEDALAZIZ SALEEM and ISMAIL KARAJAH for the bank balance.

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OVERT ACT 13

On or about September 13, 2020, in the County of San Francisco, defendant ABEDALAZIZ SALEEM sent defendants ALI TAVAF and ISMAIL KARAJAH the bank balance.

OVERT ACT 14

On or about September 16, 2020, in the County of San Francisco, defendant ABEDALAZIZ SALEEM sent defendants ALI TAVAF and ISMAIL KARAJAH a delinquent tax return letter from the California Department of Tax and Fee Administration.

OVERT ACT 15

On or about September 21, 2020, in the County of Los Angeles, defendant ALI TAVAF sent defendants ABEDALAZIZ SALEEM and ISMAIL KARAJAH the bank name and address for Megawholesale, Inc.

OVERT ACT 16

On or about September 21, 2020, in the County of Los Angeles, defendant ALI TAVAF told defendants ABEDALAZIZ SALEEM and ISMAIL KARAJAH to send payments to Megawholesale, Inc. and Eclipse Wholesale, Inc.

OVERT ACT 17

On or about September 23, 2020, in the County of San Francisco, defendant ABEDALAZIZ SALEEM deposited \$176,400 into Aztec Tobacco Distributors, Inc., Wells Fargo Bank account number ending in 7352.

OVERT ACT 18

On or about September 30, 2020, in the County of San Francisco, defendant ISMAIL KARAJAH sent defendants ALI TAVAF and ABEDALAZIZ SALEEM an invoice showing \$221,760 in sales by Aztec Tobacco Distributors, Inc. to Sonic Imports, Inc.

OVERT ACT 19

On or about October 9, 2020, in the County of San Francisco, defendant ABEDALAZIZ SALEEM sent defendants ALI TAVAF and ISMAIL KARAJAH a purchase invoice from Megawholesale, Inc.

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OVERT ACT 20

On or about October 15, 2020, defendant ISMAIL KARAJAH caused Homam Rady to file in the County of Sacramento, a Tobacco Products Distributor Tax Return for Aztec Tobacco Distributors, Inc. reporting \$0 taxable distributions.

OVERT ACT 21

On or about November 3, 2020, in the County of Los Angeles, defendant ALI TAVAF told defendants ABEDALAZIZ SALEEM and ISMAIL KARAJAH he was sending a \$220,000 check made payable to Eclipse.

OVERT ACT 22

On or about January 8, 2021, defendant ISMAIL KARAJAH caused Homam Rady to file in the County of Sacramento, a Tobacco Products Distributor Tax Return for Aztec Tobacco Distributors, Inc. reporting \$0 taxable distributions.

OVERT ACT 23

On or about and between January 11, 2021 and April 30, 2021, in the County of Los Angeles, defendant ALI TAVAF collected cash and check payments from Nader Fararji.

OVERT ACT 24

On or about and between January 11, 2021 and April 30, 2021, in the County of Los Angeles, defendant ALI TAVAF deposited or directed the deposit of cash and checks into Aztec Tobacco Distributors, Inc., Wells Fargo Bank account number ending in 7352.

OVERT ACT 25

On or about February 24, 2021, defendant ISMAIL KARAJAH told Homam Rady to close the Seller's Permit, Cigarette and Tobacco Products Distributor's License, and the Tobacco Products Distributor License for Aztec Tobacco Distributors, Inc.

OVERT ACT 26

On or about and between March 29, 2021 and May 26, 2021, in the County of San Francisco, defendant ISMAIL KARAJAH deposited or directed the deposit of checks into IK Distributors, Inc. J.P. Morgan Chase Bank, N.A. account number ending in 0693.

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OVERT ACT 27

On or about February 25, 2022, defendant ABEDALAZIZ SALEEM answered a telephone call originating from Mansoor Malik in Beaver County, Pennsylvania, during which defendant ABEDALAZIZ SALEEM told Mansoor Malik “if they call you they are going to ask for invoices and just provide a couple.”

COUNT TWO

[FALSE TAX RETURN]

On or about October 15, 2020, at and in the County of Sacramento, State of California, defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL KARAJAH, being persons required to make, render, sign or verify a tax return for tobacco distributor license number 208-762240, unlawfully filed or caused the filing of a false or fraudulent tax return for the period August 1, 2020 through August 31, 2020, in violation of Revenue and Taxation Code section 30472.

It is further alleged that defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL KARAJAH acted 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 section 30480, a felony, to wit: Failure to pay \$641,525 excise tax to the California Department of Tax and Fee Administration.

COUNT THREE

[FALSE TAX RETURN]

On or about October 15, 2020, at and in the County of Sacramento, State of California, defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL KARAJAH, being persons required to make, render, sign or verify a tax return for tobacco distributor license number 208-762240, unlawfully filed or caused the filing of a false or fraudulent tax return for the period

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1 September 1, 2020 through September 30, 2020, in violation of Revenue and Taxation Code
2 section 30472.

3 It is further alleged that defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL
4 KARAJAH acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
5 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
6 and Taxation Code section 30480, a felony, to wit: Failure to pay \$1,535,715 excise tax to the
7 California Department of Tax and Fee Administration.

8
9 **COUNT FOUR**

10 **[FALSE TAX RETURN]**

11 On or about January 8, 2021, at and in the County of Sacramento, State of California,
12 defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL KARAJAH, being persons
13 required to make, render, sign or verify a tax return for tobacco distributor license number 208-
14 762240, unlawfully filed or caused the filing of a false or fraudulent tax return for the period
15 October 1, 2020 through October 31, 2020, in violation of Revenue and Taxation Code section
16 30472.

17 It is further alleged that defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL
18 KARAJAH acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
19 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
20 and Taxation Code section 30480, a felony, to wit: Failure to pay \$1,786,536 excise tax to the
21 California Department of Tax and Fee Administration.

22
23 **COUNT FIVE**

24 **[FALSE TAX RETURN]**

25 On or about January 8, 2021, at and in the County of Sacramento, State of California,
26 defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL KARAJAH, being a person
27 required to make, render, sign or verify a tax return for tobacco distributor license number 208-
28 762240, unlawfully filed or caused the filing of a false or fraudulent tax return for the period

1 November 1, 2020 through November 30, 2020, in violation of Revenue and Taxation Code
2 section 30472.

3 It is further alleged that defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL
4 KARAJAH acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
5 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
6 and Taxation Code section 30480, a felony, to wit: Failure to pay \$481,066 excise tax to the
7 California Department of Tax and Fee Administration.

8
9 **COUNT SIX**

10 **[FALSE TAX RETURN]**

11 On or about January 8, 2021, at and in the County of Sacramento, State of California,
12 defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL KARAJAH, being a person
13 required to make, render, sign or verify a tax return for tobacco distributor license number 208-
14 762240, unlawfully filed or caused the filing of a false or fraudulent tax return for the period
15 December 1, 2020 through December 31, 2020, in violation of Revenue and Taxation Code
16 section 30472.

17 It is further alleged that defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL
18 KARAJAH acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
19 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
20 and Taxation Code section 30480, a felony, to wit: Failure to pay \$396,089 excise tax to the
21 California Department of Tax and Fee Administration.

22
23 **COUNT SEVEN**

24 **[FALSE TAX RETURN]**

25 On or about July 31, 2021, at and in the County of Sacramento, State of California,
26 defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL KARAJAH, being a person
27 required to make, render, sign or verify a tax return for tobacco distributor license number 208-
28 762240, unlawfully filed or caused the filing of a false or fraudulent tax return for the period

1 January 1, 2021 through January 31, 2021, in violation of Revenue and Taxation Code section
2 30472.

3 It is further alleged that defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL
4 KARAJAH acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
5 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
6 and Taxation Code section 30480, a felony, to wit: Failure to pay \$456,696 excise tax to the
7 California Department of Tax and Fee Administration.

8
9 **COUNT EIGHT**

10 **[ENGAGING IN BUSINESS WITHOUT A LICENSE]**

11 On or about March 25, 2021, at and in the County of San Mateo, State of California,
12 defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL KARAJAH, being a person
13 required to obtain a license as a distributor, unlawfully engaged in business as a distributor
14 without a license for the period February 1, 2021 through February 28, 2021, in violation of
15 Revenue and Taxation Code section 30149.

16 It is further alleged that defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL
17 KARAJAH acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
18 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
19 and Taxation Code section 30480, a felony, to wit: Failure to pay \$204,743 excise tax to the
20 California Department of Tax and Fee Administration.

21 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
22 Penal Code section 781.

23 **COUNT NINE**

24 **[ENGAGING IN BUSINESS WITHOUT A LICENSE]**

25 On or about April 26, 2021, at and in the County of San Mateo, State of California,
26 defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL KARAJAH, being a person
27 required to obtain a license as a distributor, unlawfully engaged in business as a distributor

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1 without a license for the period March 1, 2021 through March 31, 2021, in violation of Revenue
2 and Taxation Code section 30149.

3 It is further alleged that defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL
4 KARAJAH acted with the intent to defeat or evade an unreported tax liability exceeding twenty-
5 five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue
6 and Taxation Code section 30480, a felony, to wit: Failure to pay \$221,301 excise tax to the
7 California Department of Tax and Fee Administration.

8 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
9 Penal Code section 781.

10 **COUNT TEN**

11 **[MONEY LAUNDERING]**

12 On or about September 1, 2020 through September 30, 2020, at and in the Counties of Los
13 Angeles and San Francisco, State of California, defendants ALI TAVAF and ABEDALAZIZ
14 SALEEM did unlawfully conduct a transaction involving monetary instruments of a value
15 exceeding \$25,000 through a financial institution, with the intent to promote, manage, establish,
16 carry on, and facilitate the promotion, management, establishment, and carrying on of criminal
17 activity, in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$2,554,346 deposited
18 into an account at Wells Fargo Bank, N.A., knowing that the monetary instrument represented the
19 proceeds of, and was directly derived or indirectly from the proceeds of criminal activity.

20 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
21 Penal Code section 781.

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23 **COUNT ELEVEN**

24 **[MONEY LAUNDERING]**

25 On or about October 5, 2020 through October 28, 2020, at and in the Counties of Los
26 Angeles, San Francisco and San Mateo, State of California, defendants ALI TAVAF and
27 ABEDALAZIZ SALEEM did unlawfully conduct a transaction involving monetary instruments
28 of a value exceeding \$25,000 through a financial institution, with the intent to promote, manage,

1 establish, carry on, and facilitate the promotion, management, establishment, and carrying on of
2 criminal activity, in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$2,096,500
3 deposited into an account at Wells Fargo Bank, N.A., knowing that the monetary instrument
4 represented the proceeds of, and was directly derived or indirectly from the proceeds of criminal
5 activity.

6 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
7 Penal Code section 781.

8
9 **COUNT TWELVE**

10 **[MONEY LAUNDERING]**

11 On or about November 2, 2020 through November 30, 2020, at and in the Counties of Los
12 Angeles, San Mateo and San Bernardino, State of California, defendants ALI TAVAF and
13 ABEDALAZIZ SALEEM did unlawfully conduct a transaction involving monetary instruments
14 of a value exceeding \$25,000 through a financial institution, with the intent to promote, manage,
15 establish, carry on, and facilitate the promotion, management, establishment, and carrying on of
16 criminal activity, in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$1,966,860
17 deposited into an account at Wells Fargo Bank, N.A., knowing that the monetary instrument
18 represented the proceeds of, and was directly derived or indirectly from the proceeds of criminal
19 activity.

20 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
21 Penal Code section 781.

22
23 **COUNT THIRTEEN**

24 **[MONEY LAUNDERING]**

25 On or about December 2, 2020 through December 29, 2020, at and in the County of Los
26 Angeles, State of California, defendant ALI TAVAF did unlawfully conduct a transaction
27 involving monetary instruments of a value exceeding \$25,000 through a financial institution, with
28 the intent to promote, manage, establish, carry on, and facilitate the promotion, management,

1 establishment, and carrying on of criminal activity, in violation of Penal Code Section
2 186.10(a)(1), a felony, to wit: \$1,192,000 deposited into an account at Wells Fargo Bank, N.A.,
3 knowing that the monetary instrument represented the proceeds of, and was directly derived or
4 indirectly from the proceeds of criminal activity.

5 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
6 Penal Code section 781.

7
8 **COUNT FOURTEEN**

9 **[MONEY LAUNDERING]**

10 On or about January 7, 2021 through January 29, 2021, at and in the Counties of Los
11 Angeles and San Mateo, State of California, defendants ALI TAVAF and ABEDALAZIZ
12 SALEEM did unlawfully conduct a transaction involving monetary instruments of a value
13 exceeding \$25,000 through a financial institution, with the intent to promote, manage, establish,
14 carry on, and facilitate the promotion, management, establishment, and carrying on of criminal
15 activity, in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$1,698,000 deposited
16 into an account at Wells Fargo Bank, N.A., knowing that the monetary instrument represented the
17 proceeds of, and was directly derived or indirectly from the proceeds of criminal activity.

18 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
19 Penal Code section 781.

20
21 **COUNT FIFTEEN**

22 **[MONEY LAUNDERING]**

23 On or about February 3, 2021 through February 25, 2021, at and in the Counties of Los
24 Angeles and San Francisco, State of California, defendants ALI TAVAF and ABEDALAZIZ
25 SALEEM did unlawfully conduct a transaction involving monetary instruments of a value
26 exceeding \$25,000 through a financial institution, with the intent to promote, manage, establish,
27 carry on, and facilitate the promotion, management, establishment, and carrying on of criminal
28 activity, in violation of Penal Code Section 186.10(a)(1), a felony, to wit: \$1,892,260 deposited

1 into an account at Wells Fargo Bank, N.A., knowing that the monetary instrument represented the
2 proceeds of, and was directly derived or indirectly from the proceeds of criminal activity.

3 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
4 Penal Code section 781.

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6 **COUNT SIXTEEN**

7 **[MONEY LAUNDERING]**

8 On or about March 1, 2021 through March 31, 2021, at and in the County of Los Angeles,
9 State of California, defendant ALI TAVAF did unlawfully conduct a transaction involving
10 monetary instruments of a value exceeding \$25,000 through a financial institution, with the intent
11 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
12 and carrying on of criminal activity, in violation of Penal Code Section 186.10(a)(1), a felony, to
13 wit: \$1,227,921 deposited into an account at Wells Fargo Bank, N.A., knowing that the monetary
14 instrument represented the proceeds of, and was directly derived or indirectly from the proceeds
15 of criminal activity.

16 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
17 Penal Code section 781.

18
19 **COUNT SEVENTEEN**

20 **[MONEY LAUNDERING]**

21 On or about April 2, 2021 through April 30, 2021, at and in the County of Los Angeles,
22 State of California, defendant ALI TAVAF did unlawfully conduct a transaction involving
23 monetary instruments of a value exceeding \$25,000 through a financial institution, with the intent
24 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
25 and carrying on of criminal activity, in violation of Penal Code Section 186.10(a)(1), a felony, to
26 wit: \$512,000 deposited into an account at Wells Fargo Bank, N.A., knowing that the monetary

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1 instrument represented the proceeds of, and was directly derived or indirectly from the proceeds
2 of criminal activity.

3 It is further alleged that Sacramento County has jurisdiction in this count pursuant to
4 Penal Code section 781.

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6 **COUNT EIGHTEEN**
7 **[UNEMPLOYMENT INSURANCE FRAUD]**

8 On or about May 28, 2020 through September 5, 2021, at and in the County of
9 Sacramento, State of California, defendant ABEDALAZIZ SALEEM, willfully made or caused
10 to be made a false statement and representation, and knowingly failed to disclose a material fact,
11 in order to obtain any benefit or payment, in violation of Unemployment Insurance Code section
12 2101(a), a felony, to wit: Fraudulently obtained pandemic unemployment assistance payment
13 from the Employment Development Department.

14
15 **SPECIAL ALLEGATION ONE**
16 **[WHITE COLLAR CRIME ENHANCEMENT IN EXCESS OF \$500,000]**

17 It is further alleged pursuant to Penal Code Section 186.11(a)(2), that the offenses set
18 forth in Counts One through Nine, are related felonies, a material element of which is fraud,
19 which involve a pattern of related felony conduct, and the pattern of related felony conduct
20 involves the taking by defendants of more than five hundred thousand dollars (\$500,000) by
21 defendants ALI TAVAF, ABEDALAZIZ SALEEM and ISMAIL KARAJAH.

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

24
25 **SPECIAL ALLEGATION TWO**
26 **[MONEY LAUNDERING ENHANCEMENT]**

27 It is further alleged pursuant to Penal Code Section 186.10(c)(1)(D) that the value of the
28 individually alleged transactions in Counts Ten through Seventeen exceeds two million five

1 hundred thousand dollars (\$2,500,000), so that the court, in addition to and consecutive to the
2 felony punishment otherwise imposed pursuant to this section, shall impose an additional term of
3 imprisonment of four years as to defendants ALI TAVAF and ABEDALAZIZ SALEEM.
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5 **SPECIAL ALLEGATION THREE**

6 **[CRIME COMMITTED WHILE ON BAIL ENHANCEMENT]**

7 It is further alleged, pursuant to Penal Code Section 12022.1(b), that at the time of the
8 commission of the offenses charged in Counts One through Seventeen, defendant ALI TAVAF
9 was released from custody on bail or own recognizance for a pending felony offense, to wit:
10 Violation of Revenue and Taxation Code sections 3047 and 30480, State of California, County of
11 Los Angeles, Superior Court Case No. GA103141.
12

13 **DECLARATION**

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.
16

17 Dated: January 4, 2023

ROB BONTA
Attorney General of the State of California

19 By: *Vikram Mandla*
20 VIKRAM MANDLA
21 Deputy Attorney General
22 *Attorneys for the People of the State of*
23 *California*
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