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8	SUPERIOR COURT OF THE STATE OF CALIFORNIA					
9	COUNTY OF LOS ANGELES					
10						
11						
12	PEOPLE OF THE STATE OF CALIFORNIA,  Case No. 2484 343					
13	Plaintiff,					
14	FELONY COMPLAINT FOR					
15	V. ARREST WARRANT					
16						
17	(1) JAMES YAO KUO					
18						
19	(2) JESSIE ANTHONY CARRILLO					
20						
21						
22	Defendants					
23						
24	The Attorney General of the State of California accuses the above-named Defendants of the					
25	following offenses, which are connected to each other in their commission:					
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28	1					
	FELONY COMPLAINT FOR ARREST WARRANT					

1	COUNT 1
2	On or about and between March 1, 2016 through June 30, 2018, in the County of Los
3	Angeles, the crime of CONSPIRACY in violation of PENAL CODE SECTION 182(a)(1), a
4	Felony, was committed by Defendants JAMES YAO KUO and JESSIE CARRILLO, who did
5	unlawfully conspire together and with another person and persons whose identity is unknown to
6	commit the crime of ACCEPTING A BRIBE in violation of Section 68 of the Penal Code, a
7	felony, that pursuant to and for the purpose of carrying out the objectives and purposes of the
8	aforesaid conspiracy, the said Defendants JAMES YAO KUO and JESSIE ANTHONY
9	CARRILLO committed the following overt acts at and in the County of Los Angeles:
10	<u>OVERT ACT – 1</u>
11	On or about July 7, 2016, in the county of Los Angeles, Defendant JESSIE ANTHONY
12	CARRILLO received check #1102 in the amount of \$5,000 from Anai Servin.
13	OVERT ACT – 2
14	On or about July 7, 2016, in the county of Los Angeles, Defendant JAMES YAO KUO
15	received check #1103 in the amount of \$5,000 from Anai Servin.
16	OVERT ACT – 3
17	On or about July 13, 2016, in the county of Los Angeles, Defendant JAMES YAO KUO
18	received check #1107 in the amount of \$2,500 from Anai Servin.
19	OVERT ACT – 4
20	On or about October 17, 2016, in the county of Los Angeles, Defendant JESSIE
21	ANTHONY CARRILLO received check #1158 in the amount of \$2,500 from Anai Servin.
22	OVERT ACT – 5
23	On or about August 26, 2017, in the county of Los Angeles, Defendant JAMES YAO KUC
24	received check #1443 in the amount of \$10,000 from Daniel Kang.
25	OVERT ACT – 6
26	On or about August 26, 2017, in the county of Los Angeles, Defendant JESSIE
27	ANTHONY CARRILLO received check #1442 in the amount of \$10,000 from Daniel Kang.
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#### COUNT 2

On or about July 7, 2016, in the County of Los Angeles, the crime of ACCEPTING A BRIBE in violation of PENAL CODE SECTION 68, a Felony, was committed by Defendant JAMES YAO KUO, who did unlawfully and knowingly asked for, received, and agreed to receive of and from Dan Kang, a bribe, to wit, for the purpose of influencing the action of said defendant and upon an agreement and understanding that the action of said defendant upon a matter then pending before the said defendant in his official capacity, to wit, an Officer of the California Highway Patrol, should be influenced thereby, said defendant being then and there a Ministerial Officer, employee, and appointee of the State of California.

#### COUNT 3

On or about July 7, 2016, in the County of Los Angeles, the crime of ACCEPTING A BRIBE in violation of PENAL CODE SECTION 68, a Felony, was committed by Defendant JESSIE ANTHONY CARRILLO, who did unlawfully and knowingly asked for, received, and agreed to receive of and from Dan Kang, a bribe, to wit, for the purpose of influencing the action of said defendant and upon an agreement and understanding that the action of said defendant upon a matter then pending before the said defendant in his official capacity, to wit, an Officer of the California Highway Patrol, should be influenced thereby, said defendant being then and there a Ministerial Officer, employee, and appointee of the State of California.

# COUNT 4

On or about July 13, 2016, in the County of Los Angeles, the crime of ACCEPTING A BRIBE in violation of PENAL CODE SECTION 68, a Felony, was committed by Defendant JAMES YAO KUO, who did unlawfully and knowingly asked for, received, and agreed to receive of and from Dan Kang, a bribe, to wit, for the purpose of influencing the action of said defendant and upon an agreement and understanding that the action of said defendant upon a matter then pending before the said defendant in his official capacity, to wit, an Officer of the California Highway Patrol, should be influenced thereby, said defendant being then and there a Ministerial Officer, employee, and appointee of the State of California.

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#### **COUNT 5**

On or about October 17, 2016, in the County of Los Angeles, the crime of ACCEPTING A BRIBE in violation of PENAL CODE SECTION 68, a Felony, was committed by Defendant JESSIE ANTHONY CARRILLO, who did unlawfully and knowingly asked for, received, and agreed to receive of and from Dan Kang, a bribe, to wit, for the purpose of influencing the action of said defendant and upon an agreement and understanding that the action of said defendant upon a matter then pending before the said defendant in his official capacity, to wit, an Officer of the California Highway Patrol, should be influenced thereby, said defendant being then and there a Ministerial Officer, employee, and appointee of the State of California.

# **COUNT 6**

On or about August 26, 2017, in the County of Los Angeles, the crime of ACCEPTING A BRIBE in violation of PENAL CODE SECTION 68, a Felony, was committed by Defendant JAMES YAO KUO, who did unlawfully and knowingly asked for, received, and agreed to receive of and from Dan Kang, a bribe, to wit, for the purpose of influencing the action of said defendant and upon an agreement and understanding that the action of said defendant upon a matter then pending before the said defendant in his official capacity, to wit, an Officer of the California Highway Patrol, should be influenced thereby, said defendant being then and there a Ministerial Officer, employee, and appointee of the State of California.

## COUNT 7

On or about August 26, 2017, in the County of Los Angeles, the crime of ACCEPTING A BRIBE in violation of PENAL CODE SECTION 68, a Felony, was committed by Defendant JESSIE ANTHONY CARRILLO, who did unlawfully and knowingly asked for, received, and agreed to receive of and from Dan Kang, a bribe, to wit, for the purpose of influencing the action of said defendant and upon an agreement and understanding that the action of said defendant upon a matter then pending before the said defendant in his official capacity, to wit, an Officer of the California Highway Patrol, should be influenced thereby, said defendant being then and there a Ministerial Officer, employee, and appointee of the State of California.

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### SPECIAL ALLEGATION

# STATUE OF LIMITATIONS - LATE DISCOVERY (ZAMORA ALLEGATION)

It is further alleged for Counts 1 – 7, offenses described in Penal Code section 803(c), that the above violations were not discovered until March 6, 2019, by Investigators from the California Highway Patrol who learned about the incidents involving Defendants JAMES YAO KUO and JESSIE ANTHONY CARRILLO during a Proffer of Cecilia Mixco, former girlfriend of Defendant JAMES YAO KUO, who told CHP Investigators what she knew about the Defendants accepting money for submitting false documents to DMV, within the meaning of Penal Code section 803(c).

#### **CONCLUSION**

All of the foregoing is contrary to the form, force, and effect of the above-named statutes, and is against the peace and dignity of the People of the State of California.

Attached hereto and incorporated by reference is a declaration in support of an arrest warrant and complaint with accompanying official reports and documents of a law enforcement agency.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19<sup>th</sup> day of January 2021, at Los Angeles, California.

Respectfully Submitted,

XAVIER BECERRA Attorney General of California

NATASHA HOWARD Deputy Attorney General