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FILED

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

12 **PEOPLE OF THE STATE OF CALIFORNIA,**
13
14 Plaintiff,
15
16 **v.**
17
18 **CHATURONK NGAMARY JR.**
[REDACTED]
CHATURONK NGAMARY SR.
[REDACTED]
SANJUTHA HANTANACHAIKUL
[REDACTED]
19
20 Defendants.

Case No. BA476082
**FELONY COMPLAINT FOR
ARREST WARRANT**

21 The Attorney General of the State of California, through Deputy Attorney General Vikram
22 Mandla, by this complaint, accuses defendants CHATURONK NGAMARY JR., CHATURONK
23 NGAMARY SR., and SANJUTHA HANTANACHAIKUL of the following crimes:

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COUNT ONE

[SALES TAX EVASION]

On or about April 30, 2014 through January 31, 2015, at and in the County of Los Angeles, State of California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., being a person required to make, render, sign or verify a sales tax return for sellers permit number SR AC 13-890069, unlawfully filed false or fraudulent sales tax returns for the period January 1, 2014 through December 31, 2014, 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 7152(a)/7153.5, a **felony**, in that the defendant, collected but failed to remit sales tax to the California Department of Tax and fee Administration, to wit: Sales tax collected by Thai Hollywood Restaurant, Inc.

COUNT TWO

[GRAND THEFT]

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One: On or about January 1, 2014 through December 31, 2014, at and in the County of Los Angeles, State of California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. unlawfully took money of a value exceeding nine hundred fifty dollars (\$950), in violation of Penal Code section 487(a), a **felony**, to wit: Money charged as sales tax from customers of Thai Hollywood Restaurant, Inc.

COUNT THREE

[SALES TAX EVASION]

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, 2015 through January 31, 2016, at and in the County of Los Angeles, State of California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., being a person required

1 to make, render, sign or verify a sales tax return for sellers permit number SR AC 13-890069,
2 unlawfully filed false or fraudulent sales tax returns for the period January 1, 2015 through
3 December 31, 2015, with the intent to defeat or evade the reporting, assessment or payment of a
4 tax liability equal to or greater than twenty-five thousand dollars (\$25,000), within any 12-
5 consecutive-month period, in violation of Revenue and Taxation Code sections 7152(a)/7153.5, a
6 **felony**, in that the defendant, collected but failed to remit sales tax to the California Department
7 of Tax and fee Administration, to wit: Sales tax collected by Thai Hollywood Restaurant, Inc.

8
9 **COUNT FOUR**

10 **[GRAND THEFT]**

11 For a further and separate cause of action, being a different offense from but connected in
12 its commission as the charges set forth in Counts One through Three: On or about January 1,
13 2015 through December 31, 2015, at and in the County of Los Angeles, State of California,
14 defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. unlawfully
15 took money of a value exceeding nine hundred fifty dollars (\$950), in violation of Penal Code
16 section 487(a), a **felony**, to wit: Money charged as sales tax from customers of Thai Hollywood
17 Restaurant, Inc.

18
19 **COUNT FIVE**

20 **[SALES TAX EVASION]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Four: On or about April 30, 2016
23 through July 31, 2016, at and in the County of Los Angeles, State of California, defendants
24 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., being a person required
25 to make, render, sign or verify a sales tax return for sellers permit number SR AC 13-890069,
26 unlawfully filed false or fraudulent sales tax returns for the period January 1, 2016 through June
27 30, 2016, with the intent to defeat or evade the determination of an amount due required by law to
28 be made, in violation of Revenue and Taxation Code section 7152(a), a **misdemeanor**, in that the

1 defendant, collected but failed to remit sales tax to the California Department of Tax and fee
2 Administration, to wit: Sales tax collected by Thai Hollywood Restaurant, Inc.

3
4 **COUNT SIX**

5 **[GRAND THEFT]**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission as the charges set forth in Counts One through Five: On or about January 1, 2016
8 through June 30, 2016, at and in the County of Los Angeles, State of California, defendants
9 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. unlawfully took money of
10 a value exceeding nine hundred fifty dollars (\$950), in violation of Penal Code section 487(a), a
11 **felony**, to wit: Money charged as sales tax from customers of Thai Hollywood Restaurant, Inc.

12
13 **COUNT SEVEN**

14 **[SALES TAX EVASION]**

15 For a further and separate cause of action, being a different offense from but connected in
16 its commission as the charges set forth in Counts One through Six: On or about April 30, 2014
17 through January 31, 2015, at and in the County of Los Angeles, State of California, defendants
18 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., being a person required
19 to make, render, sign or verify a sales tax return for sellers permit number SR AC 97-218538,
20 unlawfully filed false or fraudulent sales tax returns for the period January 1, 2014 through
21 December 31, 2014, with the intent to defeat or evade the reporting, assessment or payment of a
22 tax liability equal to or greater than twenty-five thousand dollars (\$25,000), within any 12-
23 consecutive-month period, in violation of Revenue and Taxation Code sections 7152(a)/7153.5, a
24 **felony**, in that the defendant, collected but failed to remit sales tax to the California Department
25 of Tax and fee Administration, to wit: Sales tax collected by McNamara Investments, Inc.

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COUNT EIGHT
[GRAND THEFT]

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 January 1, 2014 through December 31, 2014, at and in the County of Los Angeles, State of California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. unlawfully took money of a value exceeding nine hundred fifty dollars (\$950), in violation of Penal Code section 487(a), a **felony**, to wit: Money charged as sales tax from customers of McNamara Investments, Inc.

COUNT NINE
[SALES TAX EVASION]

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 April 30, 2015 through January 31, 2016, at and in the County of Los Angeles, State of California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., being a person required to make, render, sign or verify a sales tax return for sellers permit number SR AC 97-218538, unlawfully filed false or fraudulent sales tax returns for the period January 1, 2015 through December 31, 2015, 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 7152(a)/7153.5, a **felony**, in that the defendant, collected but failed to remit sales tax to the California Department of Tax and fee Administration, to wit: Sales tax collected by McNamara Investments, Inc.

COUNT TEN
[GRAND THEFT]

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 Nine: On or about January 1, 2015

1 through December 31, 2015, at and in the County of Los Angeles, State of California, defendants
2 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. unlawfully took money of
3 a value exceeding nine hundred fifty dollars (\$950), in violation of Penal Code section 487(a), a
4 **felony**, to wit: Money charged as sales tax from customers of McNamara Investments, Inc.

5
6 **COUNT ELEVEN**

7 **[SALES TAX EVASION]**

8 For a further and separate cause of action, being a different offense from but connected in
9 its commission as the charges set forth in Counts One through Ten: On or about April 30, 2016
10 through July 31, 2016, at and in the County of Los Angeles, State of California, defendants
11 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., being a person required
12 to make, render, sign or verify a sales tax return for sellers permit number SR AC 97-218538,
13 unlawfully filed false or fraudulent sales tax returns for the period January 1, 2016 through June
14 30, 2016, with the intent to defeat or evade the reporting, assessment or payment of a tax liability
15 equal to or greater than twenty-five thousand dollars (\$25,000), within any 12-consecutive-month
16 period, in violation of Revenue and Taxation Code sections 7152(a)/7153.5, a **felony**, in that the
17 defendant, collected but failed to remit sales tax to the California Department of Tax and fee
18 Administration, to wit: Sales tax collected by McNamara Investments, Inc.

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20 **COUNT TWELVE**

21 **[GRAND THEFT]**

22 For a further and separate cause of action, being a different offense from but connected in
23 its commission as the charges set forth in Counts One through Eleven: On or about January 1,
24 2016 through June 30, 2016, at and in the County of Los Angeles, State of California, defendants
25 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. unlawfully took money of
26 a value exceeding nine hundred fifty dollars (\$950), in violation of Penal Code section 487(a), a
27 **felony**, to wit: Money charged as sales tax from customers of McNamara Investments, Inc.

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COUNT THIRTEEN

[SALES TAX EVASION]

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 Twelve: On or about April 30, 2014 through January 31, 2015, at and in the County of Los Angeles, State of California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., being a person required to make, render, sign or verify a sales tax return for sellers permit number SR BH 97-049069, unlawfully filed false or fraudulent sales tax returns for the period January 1, 2014 through December 31, 2014, 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 7152(a)/7153.5, a **felony**, in that the defendant, collected but failed to remit sales tax to the California Department of Tax and fee Administration, to wit: Sales tax collected by Thai Original BBQ of San Francisco, Inc.

COUNT FOURTEEN

[GRAND THEFT]

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 Thirteen: On or about January 1, 2014 through December 31, 2014, at and in the County of Los Angeles, State of California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. unlawfully took money of a value exceeding nine hundred fifty dollars (\$950), in violation of Penal Code section 487(a), a **felony**, to wit: Money charged as sales tax from customers of Thai Original BBQ of San Francisco, Inc.

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COUNT FIFTEEN
[SALES TAX EVASION]

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 Fourteen: On or about April 30, 2015 through January 31, 2016, at and in the County of Los Angeles, State of California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., being a person required to make, render, sign or verify a sales tax return for sellers permit number SR BH 97-049069, unlawfully filed false or fraudulent sales tax returns for the period January 1, 2015 through December 31, 2015, with the intent to defeat or evade the determination of an amount due required by law to be made, in violation of Revenue and Taxation Code section 7152(a), a **misdemeanor**, in that the defendant, collected but failed to remit sales tax to the California Department of Tax and fee Administration, to wit: Sales tax collected by Thai Original BBQ of San Francisco, Inc.

COUNT SIXTEEN
[GRAND THEFT]

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 Fifteen: On or about January 1, 2015 through December 31, 2015, at and in the County of Los Angeles, State of California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. unlawfully took money of a value exceeding nine hundred fifty dollars (\$950), in violation of Penal Code section 487(a), a **felony**, to wit: Money charged as sales tax from customers of Thai Original BBQ of San Francisco, Inc.

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COUNT SEVENTEEN
[SALES TAX EVASION]

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 Sixteen: On or about April 30, 2016 through July 31, 2016, at and in the County of Los Angeles, State of California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., being a person required to make, render, sign or verify a sales tax return for sellers permit number SR BH 97-049069, unlawfully filed false or fraudulent sales tax returns for the period January 1, 2016 through June 30, 2016, with the intent to defeat or evade the determination of an amount due required by law to be made, in violation of Revenue and Taxation Code section 7152(a), a **misdemeanor**, in that the defendant, collected but failed to remit sales tax to the California Department of Tax and fee Administration, to wit: Sales tax collected by Thai Original BBQ of San Francisco, Inc.

COUNT EIGHTEEN
[GRAND THEFT]

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 Seventeen: On or about January 1, 2016 through June 30, 2016, at and in the County of Los Angeles, State of California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. unlawfully took money of a value exceeding nine hundred fifty dollars (\$950), in violation of Penal Code section 487(a), a **felony**, to wit: Money charged as sales tax from customers of Thai Original BBQ of San Francisco, Inc.

COUNT NINETEEN
[SALES TAX EVASION]

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 Eighteen: On or about October 31, 2014 through July 31, 2015, at and in the County of Los Angeles, State of California, defendants

1 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., being a person required
2 to make, render, sign or verify a sales tax return for sellers permit number SR AC 102-556620,
3 unlawfully filed false or fraudulent sales tax returns for the period July 1, 2014 through June 30,
4 2015, with the intent to defeat or evade the determination of an amount due required by law to be
5 made, in violation of Revenue and Taxation Code section 7152(a), a **misdemeanor**, in that the
6 defendant, collected but failed to remit sales tax to the California Department of Tax and fee
7 Administration, to wit: Sales tax collected by Glendale Investment Alliance LLC.

8
9 **COUNT TWENTY**

10 **[GRAND THEFT]**

11 For a further and separate cause of action, being a different offense from but connected in
12 its commission as the charges set forth in Counts One through Nineteen: On or about July 1,
13 2014 through June 30, 2015, at and in the County of Los Angeles, State of California, defendants
14 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. unlawfully took money of
15 a value exceeding nine hundred fifty dollars (\$950), in violation of Penal Code section 487(a), a
16 **felony**, to wit: Money charged as sales tax from customers of Glendale Investment Alliance
17 LLC.

18
19 **COUNT TWENTY-ONE**

20 **[SALES TAX EVASION]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Twenty: On or about October 31,
23 2015 through July 31, 2016, at and in the County of Los Angeles, State of California, defendants
24 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., being a person required
25 to make, render, sign or verify a sales tax return for sellers permit number SR AC 102-556620,
26 unlawfully filed false or fraudulent sales tax returns for the period July 1, 2015 through June 30,
27 2016, with the intent to defeat or evade the determination of an amount due required by law to be
28 made, in violation of Revenue and Taxation Code section 7152(a), a **misdemeanor**, in that the

1 defendant, collected but failed to remit sales tax to the California Department of Tax and fee
2 Administration, to wit: Sales tax collected by Glendale Investment Alliance LLC.

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4 **COUNT TWENTY-TWO**

5 **[GRAND THEFT]**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission as the charges set forth in Counts One through Twenty-One: On or about July 1,
8 2015 through June 30, 2016, at and in the County of Los Angeles, State of California, defendants
9 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. unlawfully took money of
10 a value exceeding nine hundred fifty dollars (\$950), in violation of Penal Code section 487(a), a
11 **felony**, to wit: Money charged as sales tax from customers of Glendale Investment Alliance
12 LLC.

13
14 **COUNT TWENTY-THREE**

15 **[POSSESSION OF SALES SUPPRESSION DEVICE]**

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 Counts One through Twenty-Two: On or about
18 September 1, 2016, at and in the County of Los Angeles, State of California, defendants
19 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., possessed for
20 commercial gain an automated sales suppression device, with the knowledge that the sole purpose
21 of the device was to defeat or evade the determination of tax liability due in, violation of Revenue
22 and Taxation Code section 7153.6(b)(1), a **felony**, to wit: GUB point of sale system found at
23 5300 Santa Monica Blvd., Suite 301, Los Angeles, California 90029.

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1 **COUNT TWENTY-FOUR**

2 **[POSSESSION OF SALES SUPPRESSION DEVICE]**

3 For a further and separate cause of action, being a different offense from but connected in
4 its commission as the charges set forth in Counts One through Twenty-Three: On or about
5 September 1, 2016, at and in the County of Los Angeles, State of California, defendants
6 CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR., possessed for
7 commercial gain an automated sales suppression device, with the knowledge that the sole purpose
8 of the device was to defeat or evade the determination of tax liability due in, violation of Revenue
9 and Taxation Code section 7153.6(b)(1), a **felony**, to wit: GUB point of sale system owned by
10 Glendale Investment Alliance LLC.

11
12 **COUNT TWENTY FIVE**

13 **[FALSE TAX RETURN]**

14 For a further and separate cause of action, being a different offense from but connected in
15 its commission as the charges set forth in Counts One through Twenty-Four: On or about April
16 30, 2014, at and in the County of Los Angeles, State of California, defendant CHATURONK
17 NGAMARY SR., being a person required by law, to file any return or report, or to supply any
18 information, for account number 240-8505-2, did willfully make, render, sign, or verify any false
19 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
20 period January 1, 2014 through March 31, 2014, with the intent to evade tax, in violation of
21 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
22 and Report of Wages for Thai Hollywood Restaurant, Inc.

23
24 **COUNT TWENTY-SIX**

25 **[FAILURE TO PAY TAX]**

26 For a further and separate cause of action, being a different offense from but connected in
27 its commission as the charges set forth in Counts One through Twenty-Five: On or about April
28 30, 2014, at and in the County of Los Angeles, State of California, defendant CHATURONK

1 NGAMARY SR., being a person required to collect, account for, and pay over any tax or amount
2 required to be withheld, for account number 240-8505-2, did willfully fail to collect or truthfully
3 account for, and pay over the tax or amount required to be withheld, for the period January 1,
4 2014 through March 31, 2014, in violation of Unemployment Insurance Code section 2118.5, a
5 **felony**, to wit: Payroll tax for Thai Hollywood Restaurant, Inc.

6
7 **COUNT TWENTY-SEVEN**

8 **[FALSE TAX RETURN]**

9 For a further and separate cause of action, being a different offense from but connected in
10 its commission as the charges set forth in Counts One through Twenty-Six: On or about July 31,
11 2014, at and in the County of Los Angeles, State of California, defendant CHATURONK
12 NGAMARY JR., being a person required by law, to file any return or report, or to supply any
13 information, for account number 240-8505-2, did willfully make, render, sign, or verify any false
14 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
15 period April 1, 2014 through June 30, 2014, with the intent to evade tax, in violation of
16 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
17 and Report of Wages for Thai Hollywood Restaurant, Inc.

18
19 **COUNT TWENTY-EIGHT**

20 **[FAILURE TO PAY TAX]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Twenty-Seven: On or about July
23 31, 2014, at and in the County of Los Angeles, State of California, defendant CHATURONK
24 NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount
25 required to be withheld, for account number 240-8505-2, did willfully fail to collect or truthfully
26 account for, and pay over the tax or amount required to be withheld, for the period April 1, 2014
27 through June 30, 2014, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to
28 wit: Payroll tax for Thai Hollywood Restaurant, Inc.

1 NGAMARY JR., being a person required by law, to file any return or report, or to supply any
2 information, for account number 240-8505-2, did willfully make, render, sign, or verify any false
3 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
4 period January 1, 2015 through March 31, 2015, with the intent to evade tax, in violation of
5 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
6 and Report of Wages for Thai Hollywood Restaurant, Inc.

7
8 **COUNT THIRTY-TWO**

9 **[FAILURE TO PAY TAX]**

10 For a further and separate cause of action, being a different offense from but connected in
11 its commission as the charges set forth in Counts One through Thirty-One: On or about April 30,
12 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK
13 NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount
14 required to be withheld, for account number 240-8505-2, did willfully fail to collect or truthfully
15 account for, and pay over the tax or amount required to be withheld, for the period January 1,
16 2015 through March 31, 2015, in violation of Unemployment Insurance Code section 2118.5, a
17 **felony**, to wit: Payroll tax for Thai Hollywood Restaurant, Inc.

18
19 **COUNT THIRTY-THREE**

20 **[FALSE TAX RETURN]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Thirty-Two: On or about July 31,
23 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK
24 NGAMARY SR., being a person required by law, to file any return or report, or to supply any
25 information, for account number 240-8505-2, did willfully make, render, sign, or verify any false
26 or fraudulent return, report, or statement or supply any false or fraudulent information, for the

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1 period April 1, 2015 through June 30, 2015, with the intent to evade tax, in violation of
2 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
3 and Report of Wages for Thai Hollywood Restaurant, Inc.

4
5 **COUNT THIRTY-FOUR**

6 **[FAILURE TO PAY TAX]**

7 For a further and separate cause of action, being a different offense from but connected in
8 its commission as the charges set forth in Counts One through Thirty-Three: On or about July 31,
9 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK
10 NGAMARY SR., being a person required to collect, account for, and pay over any tax or amount
11 required to be withheld, for account number 240-8505-2, did willfully fail to collect or truthfully
12 account for, and pay over the tax or amount required to be withheld, for the period April 1, 2015
13 through June 30, 2015, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to
14 wit: Payroll tax for Thai Hollywood Restaurant, Inc.

15
16 **COUNT THIRTY-FIVE**

17 **[FALSE TAX RETURN]**

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission as the charges set forth in Counts One through Thirty-Four: On or about April 30,
20 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK
21 NGAMARY JR., being a person required by law, to file any return or report, or to supply any
22 information, for account number 240-8505-2, did willfully make, render, sign, or verify any false
23 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
24 period January 1, 2016 through March 31, 2016, with the intent to evade tax, in violation of
25 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
26 and Report of Wages for Thai Hollywood Restaurant, Inc.

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1 NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount
2 required to be withheld, for account number 360-1872-9, did willfully fail to collect or truthfully
3 account for, and pay over the tax or amount required to be withheld, for the period April 1, 2014
4 through June 30, 2014, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to
5 wit: Payroll tax for The Thai Original BBQ & Restaurant International, Inc.

6
7 **COUNT THIRTY-NINE**

8 **[FALSE TAX RETURN]**

9 For a further and separate cause of action, being a different offense from but connected in
10 its commission as the charges set forth in Counts One through Thirty-Eight: On or about January
11 31, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK
12 NGAMARY SR., being a person required by law, to file any return or report, or to supply any
13 information, for account number 360-1872-9, did willfully make, render, sign, or verify any false
14 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
15 period October 1, 2014 through December 31, 2014, with the intent to evade tax, in violation of
16 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
17 and Report of Wages for The Thai Original BBQ & Restaurant International, Inc.

18
19 **COUNT FORTY**

20 **[FAILURE TO PAY TAX]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Thirty-Nine: On or about January
23 31, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK
24 NGAMARY SR., being a person required to collect, account for, and pay over any tax or amount
25 required to be withheld, for account number 360-1872-9, did willfully fail to collect or truthfully
26 account for, and pay over the tax or amount required to be withheld, for the period October 1,
27 2014 through December 31, 2014, in violation of Unemployment Insurance Code section 2118.5,
28 a **felony**, to wit: Payroll tax for The Thai Original BBQ & Restaurant International, Inc.

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COUNT FORTY-ONE

[FALSE 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 Forty: On or about October 31, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY JR., being a person required by law, to file any return or report, or to supply any information, for account number 360-1872-9, did willfully make, render, sign, or verify any false or fraudulent return, report, or statement or supply any false or fraudulent information, for the period July 1, 2015 through September 30, 2015, with the intent to evade tax, in violation of Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return and Report of Wages for The Thai Original BBQ & Restaurant International, Inc.

COUNT FORTY-TWO

[FAILURE TO PAY TAX]

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 Forty-One: On or about October 31, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount required to be withheld, for account number 360-1872-9, did willfully fail to collect or truthfully account for, and pay over the tax or amount required to be withheld, for the period July 1, 2015 through September 30, 2015, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to wit: Payroll tax for The Thai Original BBQ & Restaurant International, Inc.

COUNT FORTY-THREE

[FALSE 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 Forty-Two: On or about April 30, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK

1 NGAMARY JR., being a person required by law, to file any return or report, or to supply any
2 information, for account number 430-9560-3, did willfully make, render, sign, or verify any false
3 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
4 period January 1, 2016 through March 31, 2016, with the intent to evade tax, in violation of
5 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
6 and Report of Wages for Thai Original BBQ of San Francisco, Inc.

7
8 **COUNT FORTY-FOUR**

9 **[FAILURE TO PAY TAX]**

10 For a further and separate cause of action, being a different offense from but connected in
11 its commission as the charges set forth in Counts One through Forty-Three: On or about April
12 30, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK
13 NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount
14 required to be withheld, for account number 430-9560-3, did willfully fail to collect or truthfully
15 account for, and pay over the tax or amount required to be withheld, for the period January 1,
16 2016 through March 31, 2016, in violation of Unemployment Insurance Code section 2118.5, a
17 **felony**, to wit: Payroll tax for Thai Original BBQ of San Francisco, Inc.

18
19 **COUNT FORTY-FIVE**

20 **[FALSE TAX RETURN]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Forty-Four: On or about April 30,
23 2014, at and in the County of Los Angeles, State of California, defendant CHATURONK
24 NGAMARY SR., being a person required by law, to file any return or report, or to supply any
25 information, for account number 407-9523-9, did willfully make, render, sign, or verify any false
26 or fraudulent return, report, or statement or supply any false or fraudulent information, for the

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1 period January 1, 2014 through March 31, 2014, with the intent to evade tax, in violation of
2 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
3 and Report of Wages for Thai California Management Group, Inc.

4
5 **COUNT FORTY-SIX**

6 **[FAILURE TO PAY TAX]**

7 For a further and separate cause of action, being a different offense from but connected in
8 its commission as the charges set forth in Counts One through Forty-Five: On or about April 30,
9 2014, at and in the County of Los Angeles, State of California, defendant CHATURONK
10 NGAMARY SR., being a person required to collect, account for, and pay over any tax or amount
11 required to be withheld, for account number 407-9523-9, did willfully fail to collect or truthfully
12 account for, and pay over the tax or amount required to be withheld, for the period January 1,
13 2014 through March 31, 2014, in violation of Unemployment Insurance Code section 2118.5, a
14 **felony**, to wit: Payroll tax for Thai California Management Group, Inc.

15
16 **COUNT FORTY-SEVEN**

17 **[FALSE TAX RETURN]**

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission as the charges set forth in Counts One through Forty-Six: On or about October
20 31, 2014, at and in the County of Los Angeles, State of California, defendant CHATURONK
21 NGAMARY SR., being a person required by law, to file any return or report, or to supply any
22 information, for account number 407-9523-9, did willfully make, render, sign, or verify any false
23 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
24 period July 1, 2014 through September 30, 2014, with the intent to evade tax, in violation of
25 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
26 and Report of Wages for Thai California Management Group, Inc.

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COUNT FORTY-EIGHT
[FAILURE TO PAY TAX]

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 Forty-Seven: On or about October 31, 2014, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY SR., being a person required to collect, account for, and pay over any tax or amount required to be withheld, for account number 407-9523-9, did willfully fail to collect or truthfully account for, and pay over the tax or amount required to be withheld, for the period July 1, 2014 through September 30, 2014, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to wit: Payroll tax for Thai California Management Group, Inc.

COUNT FORTY-NINE
[FALSE 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 Forty-Eight: On or about July 31, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY SR., being a person required by law, to file any return or report, or to supply any information, for account number 407-9523-9, did willfully make, render, sign, or verify any false or fraudulent return, report, or statement or supply any false or fraudulent information, for the period April 1, 2015 through June 30, 2015, with the intent to evade tax, in violation of Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return and Report of Wages for Thai California Management Group, Inc.

COUNT FIFTY
[FAILURE TO PAY TAX]

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 Forty-Nine: On or about July 31, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK

1 NGAMARY SR., being a person required to collect, account for, and pay over any tax or amount
2 required to be withheld, for account number 407-9523-9, did willfully fail to collect or truthfully
3 account for, and pay over the tax or amount required to be withheld, for the period April 1, 2015
4 through June 30, 2015, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to
5 wit: Payroll tax for Thai California Management Group, Inc.

6
7 **COUNT FIFTY-ONE**

8 **[FALSE TAX RETURN]**

9 For a further and separate cause of action, being a different offense from but connected in
10 its commission as the charges set forth in Counts One through Fifty: On or about January 31,
11 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK
12 NGAMARY SR., being a person required by law, to file any return or report, or to supply any
13 information, for account number 407-9523-9, did willfully make, render, sign, or verify any false
14 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
15 period October 1, 2015 through December 31, 2015, with the intent to evade tax, in violation of
16 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
17 and Report of Wages for Thai California Management Group, Inc.

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19 **COUNT FIFTY-TWO**

20 **[FAILURE TO PAY TAX]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Fifty-One: On or about January
23 31, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK
24 NGAMARY SR., being a person required to collect, account for, and pay over any tax or amount
25 required to be withheld, for account number 407-9523-9, did willfully fail to collect or truthfully
26 account for, and pay over the tax or amount required to be withheld, for the period October 1,
27 2015 through December 31, 2015, in violation of Unemployment Insurance Code section 2118.5,
28 a **felony**, to wit: Payroll tax for Thai California Management Group, Inc.

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COUNT FIFTY-THREE
[FALSE 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 Fifty-Two: On or about April 30, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY JR., being a person required by law, to file any return or report, or to supply any information, for account number 407-9523-9, did willfully make, render, sign, or verify any false or fraudulent return, report, or statement or supply any false or fraudulent information, for the period January 1, 2016 through March 31, 2016, with the intent to evade tax, in violation of Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return and Report of Wages for Thai California Management Group, Inc.

COUNT FIFTY-FOUR
[FAILURE TO PAY TAX]

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 Fifty-Three: On or about April 30, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount required to be withheld, for account number 407-9523-9, did willfully fail to collect or truthfully account for, and pay over the tax or amount required to be withheld, for the period January 1, 2016 through March 31, 2016, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to wit: Payroll tax for Thai California Management Group, Inc.

COUNT FIFTY-FIVE
[FALSE 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 Fifty-Four: On or about July 31, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK

1 NGAMARY SR., being a person required by law, to file any return or report, or to supply any
2 information, for account number 407-9523-9, did willfully make, render, sign, or verify any false
3 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
4 period April 1, 2016 through June 30, 2016, with the intent to evade tax, in violation of
5 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
6 and Report of Wages for Thai California Management Group, Inc.

7
8 **COUNT FIFTY-SIX**

9 **[FAILURE TO PAY TAX]**

10 For a further and separate cause of action, being a different offense from but connected in
11 its commission as the charges set forth in Counts One through Fifty-Five: On or about July 31,
12 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK
13 NGAMARY SR., being a person required to collect, account for, and pay over any tax or amount
14 required to be withheld, for account number 407-9523-9, did willfully fail to collect or truthfully
15 account for, and pay over the tax or amount required to be withheld, for the period April 1, 2016
16 through June 30, 2016, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to
17 wit: Payroll tax for Thai California Management Group, Inc.

18
19 **COUNT FIFTY-SEVEN**

20 **[FALSE TAX RETURN]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Fifty-Six: On or about April 30,
23 2012, at and in the County of Los Angeles, State of California, defendant CHATURONK
24 NGAMARY JR., being a person required by law, to file any return or report, or to supply any
25 information, for account number 439-6957-5, did willfully make, render, sign, or verify any false
26 or fraudulent return, report, or statement or supply any false or fraudulent information, for the

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1 period January 1, 2012 through March 31, 2012, with the intent to evade tax, in violation of
2 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
3 and Report of Wages for McNamara Investments, Inc.

4
5 **COUNT FIFTY-EIGHT**

6 **[FAILURE TO PAY TAX]**

7 For a further and separate cause of action, being a different offense from but connected in
8 its commission as the charges set forth in Counts One through Fifty-Seven: On or about April 30,
9 2012, at and in the County of Los Angeles, State of California, defendant CHATURONK
10 NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount
11 required to be withheld, for account number 439-6957-5, did willfully fail to collect or truthfully
12 account for, and pay over the tax or amount required to be withheld, for the period January 1,
13 2012 through March 31, 2012, in violation of Unemployment Insurance Code section 2118.5, a
14 **felony**, to wit: Payroll tax for McNamara Investments, Inc.

15
16 **COUNT FIFTY-NINE**

17 **[FALSE TAX RETURN]**

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission as the charges set forth in Counts One through Fifty-Eight: On or about April 30,
20 2013, at and in the County of Los Angeles, State of California, defendant CHATURONK
21 NGAMARY JR., being a person required by law, to file any return or report, or to supply any
22 information, for account number 439-6957-5, did willfully make, render, sign, or verify any false
23 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
24 period January 1, 2013 through March 31, 2013, with the intent to evade tax, in violation of
25 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
26 and Report of Wages for McNamara Investments, Inc.

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1 NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount
2 required to be withheld, for account number 439-6957-5, did willfully fail to collect or truthfully
3 account for, and pay over the tax or amount required to be withheld, for the period January 1,
4 2014 through March 31, 2014, in violation of Unemployment Insurance Code section 2118.5, a
5 **felony**, to wit: Payroll tax for McNamara Investments, Inc.

6
7 **COUNT SIXTY-THREE**

8 **[FALSE TAX RETURN]**

9 For a further and separate cause of action, being a different offense from but connected in
10 its commission as the charges set forth in Counts One through Sixty-Two: On or about January
11 31, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK
12 NGAMARY JR., being a person required by law, to file any return or report, or to supply any
13 information, for account number 439-6957-5, did willfully make, render, sign, or verify any false
14 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
15 period October 1, 2014 through December 31, 2014, with the intent to evade tax, in violation of
16 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
17 and Report of Wages for McNamara Investments, Inc.

18
19 **COUNT SIXTY-FOUR**

20 **[FAILURE TO PAY TAX]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Sixty-Three: On or about January
23 31, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK
24 NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount
25 required to be withheld, for account number 439-6957-5, did willfully fail to collect or truthfully
26 account for, and pay over the tax or amount required to be withheld, for the period October 1,
27 2014 through December 31, 2014, in violation of Unemployment Insurance Code section 2118.5,
28 a **felony**, to wit: Payroll tax for McNamara Investments, Inc.

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COUNT SIXTY-FIVE

[FALSE 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 Sixty-Four: On or about January 31, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY JR., being a person required by law, to file any return or report, or to supply any information, for account number 439-6957-5, did willfully make, render, sign, or verify any false or fraudulent return, report, or statement or supply any false or fraudulent information, for the period October 1, 2015 through December 31, 2015, with the intent to evade tax, in violation of Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return and Report of Wages for McNamara Investments, Inc.

COUNT SIXTY-SIX

[FAILURE TO PAY TAX]

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 Sixty-Five: On or about January 31, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount required to be withheld, for account number 439-6957-5, did willfully fail to collect or truthfully account for, and pay over the tax or amount required to be withheld, for the period October 1, 2015 through December 31, 2015, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to wit: Payroll tax for McNamara Investments, Inc.

COUNT SIXTY-SEVEN

[FALSE 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 Sixty-Six: On or about April 30, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK

1 NGAMARY JR., being a person required by law, to file any return or report, or to supply any
2 information, for account number 034-3528-6, did willfully make, render, sign, or verify any false
3 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
4 period January 1, 2015 through March 31, 2015, with the intent to evade tax, in violation of
5 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
6 and Report of Wages for Glendale Investment Alliance LLC.

7
8 **COUNT SIXTY-EIGHT**

9 **[FAILURE TO PAY TAX]**

10 For a further and separate cause of action, being a different offense from but connected in
11 its commission as the charges set forth in Counts One through Sixty-Seven: On or about April
12 30, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK
13 NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount
14 required to be withheld, for account number 034-3528-6, did willfully fail to collect or truthfully
15 account for, and pay over the tax or amount required to be withheld, for the period January 1,
16 2015 through March 31, 2015, in violation of Unemployment Insurance Code section 2118.5, a
17 **felony**, to wit: Payroll tax for Glendale Investment Alliance LLC.

18
19 **COUNT SIXTY-NINE**

20 **[FALSE TAX RETURN]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Sixty-Eight: On or about October
23 31, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK
24 NGAMARY JR., being a person required by law, to file any return or report, or to supply any
25 information, for account number 034-3528-6, did willfully make, render, sign, or verify any false
26 or fraudulent return, report, or statement or supply any false or fraudulent information, for the

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1 period July 1, 2015 through September 30, 2015, with the intent to evade tax, in violation of
2 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
3 and Report of Wages for Glendale Investment Alliance LLC.

4
5 **COUNT SEVENTY**

6 **[FAILURE TO PAY TAX]**

7 For a further and separate cause of action, being a different offense from but connected in
8 its commission as the charges set forth in Counts One through Sixty-Nine: On or about October
9 31, 2015, at and in the County of Los Angeles, State of California, defendant CHATURONK
10 NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount
11 required to be withheld, for account number 034-3528-6, did willfully fail to collect or truthfully
12 account for, and pay over the tax or amount required to be withheld, for the period July 1, 2015
13 through September 30, 2015, in violation of Unemployment Insurance Code section 2118.5, a
14 **felony**, to wit: Payroll tax for Glendale Investment Alliance LLC.

15
16 **COUNT SEVENTY-ONE**

17 **[FALSE TAX RETURN]**

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission as the charges set forth in Counts One through Seventy: On or about January 31,
20 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK
21 NGAMARY SR., being a person required by law, to file any return or report, or to supply any
22 information, for account number 034-3528-6, did willfully make, render, sign, or verify any false
23 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
24 period October 1, 2015 through December 31, 2015, with the intent to evade tax, in violation of
25 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
26 and Report of Wages for Glendale Investment Alliance LLC.

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COUNT SEVENTY-TWO
[FAILURE TO PAY TAX]

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 Seventy-One: On or about January 31, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY SR., being a person required to collect, account for, and pay over any tax or amount required to be withheld, for account number 034-3528-6, did willfully fail to collect or truthfully account for, and pay over the tax or amount required to be withheld, for the period October 1, 2015 through December 31, 2015, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to wit: Payroll tax for Glendale Investment Alliance LLC.

COUNT SEVENTY-THREE
[FALSE 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 Seventy-Two: On or about July 31, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY JR., being a person required by law, to file any return or report, or to supply any information, for account number 034-3528-6, did willfully make, render, sign, or verify any false or fraudulent return, report, or statement or supply any false or fraudulent information, for the period April 1, 2016 through June 30, 2016, with the intent to evade tax, in violation of Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return and Report of Wages for Glendale Investment Alliance LLC.

COUNT SEVENTY-FOUR
[FAILURE TO PAY TAX]

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 Seventy-Three: On or about July 31, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK

1 NGAMARY JR., being a person required to collect, account for, and pay over any tax or amount
2 required to be withheld, for account number 034-3528-6, did willfully fail to collect or truthfully
3 account for, and pay over the tax or amount required to be withheld, for the period April 1, 2016
4 through June 30, 2016, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to
5 wit: Payroll tax for Glendale Investment Alliance LLC.

6
7 **COUNT SEVENTY-FIVE**

8 **[FALSE TAX RETURN]**

9 For a further and separate cause of action, being a different offense from but connected in
10 its commission as the charges set forth in Counts One through Seventy-Six: On or about October
11 31, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK
12 NGAMARY SR., being a person required by law, to file any return or report, or to supply any
13 information, for account number 034-3528-6, did willfully make, render, sign, or verify any false
14 or fraudulent return, report, or statement or supply any false or fraudulent information, for the
15 period July 1, 2016 through September 30, 2016, with the intent to evade tax, in violation of
16 Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return
17 and Report of Wages for Glendale Investment Alliance LLC.

18
19 **COUNT SEVENTY-SIX**

20 **[FAILURE TO PAY TAX]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Seventy-Five: On or about
23 October 31, 2016, at and in the County of Los Angeles, State of California, defendant
24 CHATURONK NGAMARY SR., being a person required to collect, account for, and pay over
25 any tax or amount required to be withheld, for account number 034-3528-6, did willfully fail to
26 collect or truthfully account for, and pay over the tax or amount required to be withheld, for the
27 period July 1, 2016 through September 30, 2016, in violation of Unemployment Insurance Code
28 section 2118.5, a **felony**, to wit: Payroll tax for Glendale Investment Alliance LLC.

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COUNT SEVENTY-SEVEN

[FALSE 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 Seventy-Six: On or about October 31, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY SR., being a person required by law, to file any return or report, or to supply any information, for account number 339-6119-4, did willfully make, render, sign, or verify any false or fraudulent return, report, or statement or supply any false or fraudulent information, for the period July 1, 2016 through September 30, 2016, with the intent to evade tax, in violation of Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return and Report of Wages for Siam Management Group, Inc.

COUNT SEVENTY-EIGHT

[FAILURE TO PAY TAX]

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 Seventy-Seven: On or about October 31, 2016, at and in the County of Los Angeles, State of California, defendant CHATURONK NGAMARY SR., being a person required to collect, account for, and pay over any tax or amount required to be withheld, for account number 339-6119-4, did willfully fail to collect or truthfully account for, and pay over the tax or amount required to be withheld, for the period July 1, 2016 through September 30, 2016, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to wit: Payroll tax for Siam Management Group, Inc.

COUNT SEVENTY-NINE

[FALSE 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 Seventy-Eight: On or about January 31, 2013, at and in the County of Los Angeles, State of California, defendant

1 SANJUTHA HANTANACHAIKUL, being a person required by law, to file any return or report,
2 or to supply any information, for account number 468-8980-4, did willfully make, render, sign, or
3 verify any false or fraudulent return, report, or statement or supply any false or fraudulent
4 information, for the period October 1, 2012 through December 31, 2012, with the intent to evade
5 tax, in violation of Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly
6 Contribution Return and Report of Wages for American-Thai Investments, Inc.

7
8 **COUNT EIGHTY**

9 **[FAILURE TO PAY TAX]**

10 For a further and separate cause of action, being a different offense from but connected in
11 its commission as the charges set forth in Counts One through Seventy-Nine: On or about
12 January 31, 2013, at and in the County of Los Angeles, State of California, defendant
13 SANJUTHA HANTANACHAIKUL, being a person required to collect, account for, and pay
14 over any tax or amount required to be withheld, for account number 468-8980-4, did willfully fail
15 to collect or truthfully account for, and pay over the tax or amount required to be withheld, for the
16 period October 1, 2012 through December 31, 2012, in violation of Unemployment Insurance
17 Code section 2118.5, a **felony**, to wit: Payroll tax for American-Thai Investments, Inc.

18
19 **COUNT EIGHTY-ONE**

20 **[FALSE TAX RETURN]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Eighty: On or about January 31,
23 2014, at and in the County of Los Angeles, State of California, defendant SANJUTHA
24 HANTANACHAIKUL, being a person required by law, to file any return or report, or to supply
25 any information, for account number 468-8980-4, did willfully make, render, sign, or verify any
26 false or fraudulent return, report, or statement or supply any false or fraudulent information, for

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1 the period October 1, 2013 through December 31, 2013, with the intent to evade tax, in violation
2 of Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution
3 Return and Report of Wages for American-Thai Investments, Inc.

4
5 **COUNT EIGHTY-TWO**

6 **[FAILURE TO PAY TAX]**

7 For a further and separate cause of action, being a different offense from but connected in
8 its commission as the charges set forth in Counts One through Eighty-One: On or about January
9 31, 2014, at and in the County of Los Angeles, State of California, defendant SANJUTHA
10 HANTANACHAIKUL, being a person required to collect, account for, and pay over any tax or
11 amount required to be withheld, for account number 468-8980-4, did willfully fail to collect or
12 truthfully account for, and pay over the tax or amount required to be withheld, for the period
13 October 1, 2013 through December 31, 2013, in violation of Unemployment Insurance Code
14 section 2118.5, a **felony**, to wit: Payroll tax for American-Thai Investments, Inc.

15
16 **COUNT EIGHTY-THREE**

17 **[FALSE TAX RETURN]**

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission as the charges set forth in Counts One through Eighty-Two: On or about January
20 31, 2015, at and in the County of Los Angeles, State of California, defendant SANJUTHA
21 HANTANACHAIKUL, being a person required by law, to file any return or report, or to supply
22 any information, for account number 468-8980-4, did willfully make, render, sign, or verify any
23 false or fraudulent return, report, or statement or supply any false or fraudulent information, for
24 the period October 1, 2014 through December 31, 2014, with the intent to evade tax, in violation
25 of Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution
26 Return and Report of Wages for American-Thai Investments, Inc.

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COUNT EIGHTY-FOUR
[FAILURE TO PAY TAX]

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 Eighty-Three: On or about January 31, 2015, at and in the County of Los Angeles, State of California, defendant SANJUTHA HANTANACHAIKUL, being a person required to collect, account for, and pay over any tax or amount required to be withheld, for account number 468-8980-4, did willfully fail to collect or truthfully account for, and pay over the tax or amount required to be withheld, for the period October 1, 2014 through December 31, 2014, in violation of Unemployment Insurance Code section 2118.5, a **felony**, to wit: Payroll tax for American-Thai Investments, Inc.

COUNT EIGHTY-FIVE
[FALSE 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 Eighty-Four: On or about October 31, 2016, at and in the County of Los Angeles, State of California, defendant SANJUTHA HANTANACHAIKUL, being a person required by law, to file any return or report, or to supply any information, for account number 468-8980-4, did willfully make, render, sign, or verify any false or fraudulent return, report, or statement or supply any false or fraudulent information, for the period July 1, 2016 through September 30, 2016, with the intent to evade tax, in violation of Unemployment Insurance Code section 2117.5, a **felony**, to wit: Quarterly Contribution Return and Report of Wages for American-Thai Investments, Inc.

COUNT EIGHTY-SIX
[FAILURE TO PAY TAX]

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 Eighty-Five: On or about October 31, 2016, at and in the County of Los Angeles, State of California, defendant SANJUTHA

1 HANTANACHAIKUL, being a person required to collect, account for, and pay over any tax or
2 amount required to be withheld, for account number 468-8980-4, did willfully fail to collect or
3 truthfully account for, and pay over the tax or amount required to be withheld, for the period July
4 30, 2016 through September 30, 2016, in violation of Unemployment Insurance Code section
5 2118.5, a **felony**, to wit: Payroll tax for American-Thai Investments, Inc.

6
7 **COUNT EIGHTY-SEVEN**

8 **[WORKERS' COMPENSATION FRAUD]**

9 For a further and separate cause of action, being a different offense from but connected in
10 its commission as the charges set forth in Counts One through Eighty-Six: On or about June 1,
11 2013 through September 1, 2016, at and in the County of Los Angeles, State of California,
12 defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR. knowingly
13 made, or caused to be made a false or fraudulent statement, orally or in writing, of a fact material
14 to the determination of the premium, rate, or cost of any policy of workers' compensation
15 insurance, for the purpose of reducing the premium, rate or cost of the insurance, in violation of
16 Insurance Code section 11760(a), a **felony**, to wit: Underreporting of payroll to ZNAT Insurance
17 Company.

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19 **COUNT EIGHTY-EIGHT**

20 **[WORKERS' COMPENSATION FRAUD]**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Eighty-Seven: On or about
23 January 1, 2011 through September 1, 2016, at and in the County of Los Angeles, State of
24 California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR.
25 knowingly made, or caused to be made a false or fraudulent statement, orally or in writing, of a
26 fact material to the determination of the premium, rate, or cost of any policy of workers'
27 compensation insurance, for the purpose of reducing the premium, rate or cost of the insurance, in

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1 violation of Insurance Code section 11760(a), a **felony**, to wit: Underreporting of payroll to
2 Farmers Insurance Exchange.

3
4 **COUNT EIGHTY-NINE**

5 **[WORKERS' COMPENSATION FRAUD]**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission as the charges set forth in Counts One through Eighty-Eight: On or about
8 September 15, 2012 through September 1, 2016, at and in the County of Los Angeles, State of
9 California, defendants CHATURONK NGAMARY JR. and CHATURONK NGAMARY SR.
10 knowingly made, or caused to be made a false or fraudulent statement, orally or in writing, of a
11 fact material to the determination of the premium, rate, or cost of any policy of workers'
12 compensation insurance, for the purpose of reducing the premium, rate or cost of the insurance, in
13 violation of Insurance Code section 11760(a), a **felony**, to wit: Underreporting of payroll to
14 Employers Compensation Insurance.

15
16 **COUNT NINETY**

17 **[WORKERS' COMPENSATION FRAUD]**

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission as the charges set forth in Counts One through Eighty-Nine: On or about May 14,
20 2014 through September 1, 2016, at and in the County of Los Angeles, State of California,
21 defendant SANJUTHA HANTANACHAIKUL knowingly made, or caused to be made a false or
22 fraudulent statement, orally or in writing, of a fact material to the determination of the premium,
23 rate, or cost of any policy of workers' compensation insurance, for the purpose of reducing the
24 premium, rate or cost of the insurance, in violation of Insurance Code section 11760(a), a **felony**,
25 to wit: Underreporting of payroll to Employers Compensation Insurance.

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1 **SPECIAL ALLEGATION ONE**

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

3 It is further alleged, pursuant to Penal Code Section 186.11(a)(2), that the offenses set
4 forth in Counts One through Twenty-Eight, Thirty-One and Thirty-Two, Thirty-Five through
5 Thirty-Eight, Forty-One through Forty-Four, Fifty-Three and Fifty-Four, Fifty-Seven through
6 Seventy, Seventy-Three and Seventy-Four and Eighty-Seven through Eighty-Nine, are related
7 felonies, a material element of which is fraud, which involve a pattern of related felony conduct,
8 and the pattern of related felony conduct involves the taking of more than five hundred thousand
9 dollars (\$500,000) by defendant CHATURONK NGAMARY JR.

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

12
13 **SPECIAL ALLEGATION TWO**

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

15 It is further alleged, pursuant to Penal Code Section 186.11(a)(2), that the offenses set
16 forth in Counts One through Twenty-Six, Twenty-Nine and Thirty, Thirty-Three and Thirty-Four,
17 Thirty-Nine and Forty, Forty-Five through Fifty-Two, Fifty-Five and Fifty-Six, Seventy-One and
18 Seventy-Two, Seventy-Five through Seventy-Eight and Eighty-Seven through Eighty-Nine, are
19 related felonies, a material element of which is fraud, which involve a pattern of related felony
20 conduct, and the pattern of related felony conduct involves the taking of more than five hundred
21 thousand dollars (\$500,000) by defendant CHATURONK NGAMARY SR.

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

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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: 12/27/19

XAVIER BECERRA
Attorney General of the State of California

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