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CLERK OF SUPERIOR COURT  
LOS ANGELES COUNTY

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF LOS ANGELES  
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13 **PEOPLE OF THE STATE OF CALIFORNIA,**

14 Plaintiff,

15 v.

16  
17 **TAMUR SALEEM RAJPUT** [REDACTED]  
18 **AKA TAMUR SALEEM,**

19 Defendant.

Case No. BA484237

**FELONY COMPLAINT**

20 The Attorney General of the State of California, through Deputy Attorney General Vikram  
21 Mandia, by this complaint, accuses defendant TAMUR SALEEM RAJPUT of the following  
22 crimes:  
23

24 **COUNT ONE**

25 **[FALSE SALES TAX RETURN]**

26 On or about January 25, 2017 through January 25, 2018, at and in the County of Los  
27 Angeles, State of California, defendant TAMUR SALEEM RAJPUT, being a person required to  
28 make, render, sign or verify a tax return for tobacco distributor license number CP STF 50-

1 005399, unlawfully filed a false or fraudulent tax return for the period January 1, 2017 through  
2 December 31, 2017, with the intent to defeat or evade an unreported tax liability exceeding  
3 twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of  
4 Revenue and Taxation Code Sections 30472(a) and 30480, a **felony**, in that defendant failed to  
5 remit \$34,420 excise tax to the California Department of Tax and Fee Administration.

6  
7 **COUNT TWO**

8 **[MONEY LAUNDERING]**

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 Count One: On or about January 5, 2017 through  
11 January 30, 2017, at and in the county of Los Angeles, State of California, defendant TAMUR  
12 SALEEM RAJPUT willfully and unlawfully conducted transactions involving monetary  
13 instruments of a total value exceeding \$25,000, in violation of Penal Code Section 186.1 O(a)(2), a  
14 felony, to wit: \$120,723.52 deposited into an account at JP Morgan Chase Bank, N.A., knowing  
15 that such monetary instrument or instruments represent the proceeds of, or is derived directly  
16 from the proceeds of criminal activity.

17  
18 **COUNT THREE**

19 **[MONEY LAUNDERING]**

20 For a further and separate cause of action, being a different offense from but connected in  
21 its commission as the charges set forth in Counts One through Two: On or about February 2,  
22 2017 through February 22, 2017, at and in the county of Los Angeles, State of California,  
23 defendant TAMUR SALEEM RAJPUT willfully and unlawfully conducted transactions involving  
24 monetary instruments of a total value exceeding \$25,000, in violation of Penal Code Section  
25 186.1O(a)(2), a felony, to wit: \$318,534.20 deposited into an account at Wallis State Bank,  
26 knowing that such monetary instrument or instruments represent the proceeds of, or is derived  
27 directly from the proceeds of criminal activity.

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**COUNT FOUR**

**[MONEY LAUNDERING]**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Three: On or about March 7, 2017 through March 31, 2017, at and in the county of Los Angeles, State of California, defendant TAMUR SALEEM RAJPUT willfully and unlawfully conducted transactions involving monetary instruments of a total value exceeding \$25,000, in violation of Penal Code Section 186.10(a)(2), a felony, to wit: \$379,296.64 deposited into an account at Wallis State Bank, knowing that such monetary instrument or instruments represent the proceeds of, or is derived directly from the proceeds of criminal activity.

**COUNT FIVE**

**[MONEY LAUNDERING]**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Four: On or about April 5, 2017 through April 28, 2017, at and in the county of Los Angeles, State of California, defendant TAMUR SALEEM RAJPUT willfully and unlawfully conducted transactions involving monetary instruments of a total value exceeding \$25,000, in violation of Penal Code Section 186.10(a)(2), a felony, to wit: \$535,690.72 deposited into an account at Wallis State Bank, knowing that such monetary instrument or instruments represent the proceeds of, or is derived directly from the proceeds of criminal activity.

**COUNT SIX**

**[MONEY LAUNDERING]**

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Five: On or about May 1, 2017 through May 30, 2017, at and in the county of Los Angeles, State of California, defendant TAMUR SALEEM RAJPUT willfully and unlawfully conducted transactions involving monetary

1 instruments of a total value exceeding \$25,000, in violation of Penal Code Section 186.10(a)(2), a  
2 felony, to wit: \$423,341.42 deposited into an account at Wallis State Bank, knowing that such  
3 monetary instrument or instruments represent the proceeds of, or is derived directly from the  
4 proceeds of criminal activity.

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6 **COUNT SEVEN**

7 **[MONEY LAUNDERING]**

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 Six: On or about June 6, 2017  
10 through June 26, 2017, at and in the county of Los Angeles, State of California, defendant  
11 TAMUR SALEEM RAJPUT willfully and unlawfully conducted transactions involving monetary  
12 instruments of a total value exceeding \$25,000, in violation of Penal Code Section 186.10(a)(2), a  
13 felony, to wit: \$137,128.25 deposited into an account at Wallis State Bank, knowing that such  
14 monetary instrument or instruments represent the proceeds of, or is derived directly from the  
15 proceeds of criminal activity.

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17 **SPECIAL ALLEGATION ONE**

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

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

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

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**SPECIAL ALLEGATION TWO**

**[MONEY LAUNDERING ENHANCEMENT]**

It is further alleged, pursuant to Penal Code Section 186.10(c)(1)(A), that the value of the individually alleged transactions in Count Two exceeds fifty thousand dollars (\$50,000) but is less than one hundred fifty thousand dollars (\$150,000), so that the court, in addition to and consecutive to the felony punishment otherwise imposed pursuant to this section, shall impose an additional term of imprisonment of one year.

**SPECIAL ALLEGATION THREE**

**[MONEY LAUNDERING ENHANCEMENT]**

It is further alleged, pursuant to Penal Code Section 186.10(c)(1)(B), that the value of the individually alleged transactions in Count Three exceeds one hundred fifty thousand dollars (\$150,000) but is less than one million thousand dollars (\$1,000,000), so that the court, in addition to and consecutive to the felony punishment otherwise imposed pursuant to this section, shall impose an additional term of imprisonment of two years.

**SPECIAL ALLEGATION FOUR**

**[MONEY LAUNDERING ENHANCEMENT]**

It is further alleged, pursuant to Penal Code Section 186.10(c)(1)(B), that the value of the individually alleged transactions in Count Four exceeds one hundred fifty thousand dollars (\$150,000) but is less than one million thousand dollars (\$1,000,000), so that the court, in addition to and consecutive to the felony punishment otherwise imposed pursuant to this section, shall impose an additional term of imprisonment of two years.

**SPECIAL ALLEGATION FIVE**

**[MONEY LAUNDERING ENHANCEMENT]**

It is further alleged, pursuant to Penal Code Section 186.10(c)(1)(B), that the value of the individually alleged transactions in Count Five exceeds one hundred fifty thousand dollars

1 (\$150,000) but is less than one million thousand dollars (\$1,000,000), so that the court, in  
2 addition to and consecutive to the felony punishment otherwise imposed pursuant to this section,  
3 shall impose an additional term of imprisonment of two years.  
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5 **SPECIAL ALLEGATION SIX**  
6 **[MONEY LAUNDERING ENHANCEMENT]**

7 It is further alleged, pursuant to Penal Code Section 186.10(c)(1)(B), that the value of the  
8 individually alleged transactions in Count Six exceeds one hundred fifty thousand dollars  
9 (\$150,000) but is less than one million thousand dollars (\$1,000,000), so that the court, in  
10 addition to and consecutive to the felony punishment otherwise imposed pursuant to this section,  
11 shall impose an additional term of imprisonment of two years.  
12

13 **SPECIAL ALLEGATION SEVEN**  
14 **[MONEY LAUNDERING ENHANCEMENT]**

15 It is further alleged, pursuant to Penal Code Section 186.10(c)(1)(B), that the value of the  
16 individually alleged transactions in Count Seven exceeds fifty thousand dollars (\$50,000) but is  
17 less than one hundred fifty thousand dollars (\$150,000), so that the court, in addition to and  
18 consecutive to the felony punishment otherwise imposed pursuant to this section, shall impose an  
19 additional term of imprisonment of one year.

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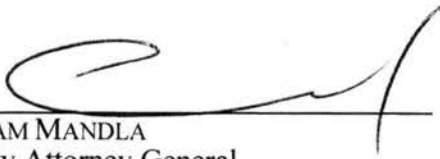
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**DECLARATION**

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

Dated: 1/12/2021

XAVIER BECERRA  
Attorney General of the State of California

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