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

**PEOPLE OF THE STATE OF CALIFORNIA,**

Plaintiff,

v.

**ALI TAVAF ( [REDACTED] ),**

Defendant.

Case No. GA103141

**INFORMATION**

The Attorney General of the State of California, through Deputy Attorney General Vikram Mandla, by this Felony Information, accuses defendant ALI TAVAF of the following crimes:

**COUNT ONE**

**FILING FRAUDULENT REPORT**

On or about May 25, 2012, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a person required to make, render, sign or verify a tax return for tobacco distributor license number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period April 1, 2012 through April 30, 2012, with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-

1 consecutive month period, in violation of Revenue and Taxation Code Sections 30472/30480, a  
2 **felony**, in that defendant failed to remit \$34,420 excise tax to the California Department of Tax  
3 and Fee Administration.

4  
5 **COUNT TWO**

6 **FILING FRAUDULENT REPORT**

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 Count One: On or about June 25, 2012, at and in the  
9 County of Los Angeles, State of California, defendant ALI TAVAF, being a person required to  
10 make, render, sign or verify a tax return for tobacco distributor license number CP STF 05-  
11 0004827, unlawfully filed false or fraudulent tax returns for the period May 1, 2012 through May  
12 31, 2012, with the intent to defeat or evade an unreported tax liability exceeding twenty-five  
13 thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and  
14 Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit \$137,684 excise  
15 tax to the California Department of Tax and Fee Administration.

16  
17 **COUNT THREE**

18 **FILING FRAUDULENT REPORT**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth in Counts One through Two: On or about September 25,  
21 2012, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
22 person required to make, render, sign or verify a tax return for tobacco distributor license number  
23 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period August 1,  
24 2012 through August 30, 2012, with the intent to defeat or evade an unreported tax liability  
25 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
26 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
27 to remit \$93,308 excise tax to the California Department of Tax and Fee Administration.

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1 **COUNT FOUR**

2 **FILING FRAUDULENT REPORT**

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 Three: On or about December 25,  
5 2012, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
6 person required to make, render, sign or verify a tax return for tobacco distributor license number  
7 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period November 1,  
8 2012 through November 30, 2012, with the intent to defeat or evade an unreported tax liability  
9 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
10 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
11 to remit \$59,808 excise tax to the California Department of Tax and Fee Administration.

12  
13 **COUNT FIVE**

14 **FILING FRAUDULENT REPORT**

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 Four: On or about January 25,  
17 2013, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
18 person required to make, render, sign or verify a tax return for tobacco distributor license number  
19 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period December 1,  
20 2012 through December 31, 2012, with the intent to defeat or evade an unreported tax liability  
21 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
22 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
23 to remit \$41,317 excise tax to the California Department of Tax and Fee Administration.

24  
25 **COUNT SIX**

26 **FILING FRAUDULENT REPORT**

27 For a further and separate cause of action, being a different offense from but connected in  
28 its commission as the charges set forth in Counts One through Five: On or about February 25,



1 2013, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
2 person required to make, render, sign or verify a tax return for tobacco distributor license number  
3 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period January 1,  
4 2013 through January 31, 2013, with the intent to defeat or evade an unreported tax liability  
5 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
6 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
7 to remit \$89,446 excise tax to the California Department of Tax and Fee Administration.

8  
9 **COUNT SEVEN**

10 **FILING FRAUDULENT REPORT**

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 Six: On or about April 25, 2013,  
13 at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a person  
14 required to make, render, sign or verify a tax return for tobacco distributor license number CP  
15 STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period March 1, 2013  
16 through March 31, 2013, with the intent to defeat or evade an unreported tax liability exceeding  
17 twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of  
18 Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit  
19 \$46,275 excise tax to the California Department of Tax and Fee Administration.

20  
21 **COUNT EIGHT**

22 **FILING FRAUDULENT REPORT**

23 For a further and separate cause of action, being a different offense from but connected in  
24 its commission as the charges set forth in Counts One through Seven: On or about June 25, 2013,  
25 at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a person  
26 required to make, render, sign or verify a tax return for tobacco distributor license number CP  
27 STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period May 1, 2013  
28 through May 31, 2013, in violation of Revenue and Taxation Code Section 30472, a

1 **misdemeanor**, in that defendant failed to remit \$3,469 excise tax to the California Department of  
2 Tax and Fee Administration.

3  
4 **COUNT NINE**

5 **FILING FRAUDULENT REPORT**

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 Eight: On or about July 25, 2013,  
8 at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a person  
9 required to make, render, sign or verify a tax return for tobacco distributor license number CP  
10 STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period June 1, 2013  
11 through June 30, 2013, in violation of Revenue and Taxation Code Section 30472, a  
12 **misdemeanor**, in that defendant failed to remit \$8,187 excise tax to the California Department of  
13 Tax and Fee Administration.

14  
15 **COUNT TEN**

16 **FILING FRAUDULENT REPORT**

17 For a further and separate cause of action, being a different offense from but connected in  
18 its commission as the charges set forth in Counts One through Nine: On or about August 25,  
19 2013, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
20 person required to make, render, sign or verify a tax return for tobacco distributor license number  
21 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period July 1, 2013  
22 through July 31, 2013, with the intent to defeat or evade an unreported tax liability exceeding  
23 twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of  
24 Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit  
25 \$58,295 excise tax to the California Department of Tax and Fee Administration.

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1 **COUNT ELEVEN**

2 **FILING FRAUDULENT REPORT**

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 Ten: On or about September 25,  
5 2013, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
6 person required to make, render, sign or verify a tax return for tobacco distributor license number  
7 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period August 1,  
8 2013 through August 31, 2013, with the intent to defeat or evade an unreported tax liability  
9 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
10 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
11 to remit \$63,358 excise tax to the California Department of Tax and Fee Administration.  
12

13 **COUNT TWELVE**

14 **FILING FRAUDULENT REPORT**

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 Eleven: On or about October 25,  
17 2013, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
18 person required to make, render, sign or verify a tax return for tobacco distributor license number  
19 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period September 1,  
20 2013 through September 30, 2013, with the intent to defeat or evade an unreported tax liability  
21 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
22 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
23 to remit \$25,670 excise tax to the California Department of Tax and Fee Administration.  
24

25 **COUNT THIRTEEN**

26 **FILING FRAUDULENT REPORT**

27 For a further and separate cause of action, being a different offense from but connected in  
28 its commission as the charges set forth in Counts One through Twelve: On or about November

1 25, 2013, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
2 a person required to make, render, sign or verify a tax return for tobacco distributor license  
3 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period  
4 October 1, 2013 through October 31, 2013, with the intent to defeat or evade an unreported tax  
5 liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month  
6 period, in violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that  
7 defendant failed to remit \$102,941 excise tax to the California Department of Tax and Fee  
8 Administration.

9  
10 **COUNT FOURTEEN**

11 **FILING FRAUDULENT REPORT**

12 For a further and separate cause of action, being a different offense from but connected in  
13 its commission as the charges set forth in Counts One through Thirteen: On or about December  
14 25, 2013, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
15 a person required to make, render, sign or verify a tax return for tobacco distributor license  
16 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period  
17 November 1, 2013 through November 30, 2013, with the intent to defeat or evade an unreported  
18 tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month  
19 period, in violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that  
20 defendant failed to remit \$102,322 excise tax to the California Department of Tax and Fee  
21 Administration.

22  
23 **COUNT FIFTEEN**

24 **FILING FRAUDULENT REPORT**

25 For a further and separate cause of action, being a different offense from but connected in  
26 its commission as the charges set forth in Counts One through Fourteen: On or about January 25,  
27 2014, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
28 person required to make, render, sign or verify a tax return for tobacco distributor license number



1 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period December 1,  
2 2013 through December 31, 2013, with the intent to defeat or evade an unreported tax liability  
3 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
4 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
5 to remit \$131,062 excise tax to the California Department of Tax and Fee Administration.

6  
7 **COUNT SIXTEEN**

8 **FILING FRAUDULENT REPORT**

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 Fifteen: On or about February 25,  
11 2014, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
12 person required to make, render, sign or verify a tax return for tobacco distributor license number  
13 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period January 1,  
14 2014 through January 31, 2014, with the intent to defeat or evade an unreported tax liability  
15 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
16 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
17 to remit \$205,768 excise tax to the California Department of Tax and Fee Administration.

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19 **COUNT SEVENTEEN**

20 **FILING FRAUDULENT REPORT**

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 Sixteen: On or about March 25,  
23 2014, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
24 person required to make, render, sign or verify a tax return for tobacco distributor license number  
25 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period February 1,  
26 2014 through February 28, 2014, with the intent to defeat or evade an unreported tax liability  
27 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
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1 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
2 to remit \$288,148 excise tax to the California Department of Tax and Fee Administration.

3  
4 **COUNT EIGHTEEN**

5 **FILING FRAUDULENT REPORT**

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 Seventeen: On or about April 25,  
8 2014, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
9 person required to make, render, sign or verify a tax return for tobacco distributor license number  
10 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period March 1, 2014  
11 through March 31, 2014, with the intent to defeat or evade an unreported tax liability exceeding  
12 twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of  
13 Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit  
14 \$167,247 excise tax to the California Department of Tax and Fee Administration.

15  
16 **COUNT NINETEEN**

17 **FILING FRAUDULENT REPORT**

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 Eighteen: On or about May 25,  
20 2014, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
21 person required to make, render, sign or verify a tax return for tobacco distributor license number  
22 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period April 1, 2014  
23 through April 30, 2014, with the intent to defeat or evade an unreported tax liability exceeding  
24 twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of  
25 Revenue and Taxation Code Sections 30472/30480, any **felony**, in that defendant failed to remit  
26 \$359,961 excise tax to the California Department of Tax and Fee Administration.

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1 **COUNT TWENTY**

2 **FILING FRAUDULENT REPORT**

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 Nineteen: On or about June 25,  
5 2014, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
6 person required to make, render, sign or verify a tax return for tobacco distributor license number  
7 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period May 1, 2014  
8 through May 31, 2014, with the intent to defeat or evade an unreported tax liability exceeding  
9 twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of  
10 Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit  
11 \$318,523 excise tax to the California Department of Tax and Fee Administration.  
12

13 **COUNT TWENTY-ONE**

14 **FILING FRAUDULENT REPORT**

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 Twenty: On or about July 25,  
17 2014, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
18 person required to make, render, sign or verify a tax return for tobacco distributor license number  
19 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period June 1, 2014  
20 through June 30, 2014, with the intent to defeat or evade an unreported tax liability exceeding  
21 twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of  
22 Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit  
23 \$369,250 excise tax to the California Department of Tax and Fee Administration.  
24

25 **COUNT TWENTY-TWO**

26 **FILING FRAUDULENT REPORT**

27 For a further and separate cause of action, being a different offense from but connected in  
28 its commission as the charges set forth in Counts One through Twenty-One: On or about August



1 25, 2014, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
2 a person required to make, render, sign or verify a tax return for tobacco distributor license  
3 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period July 1,  
4 2014 through July 31, 2014, with the intent to defeat or evade an unreported tax liability  
5 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
6 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
7 to remit \$303,415 excise tax to the California Department of Tax and Fee Administration.  
8

9 **COUNT TWENTY-THREE**

10 **FILING FRAUDULENT REPORT**

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 Twenty-Two: On or about  
13 September 25, 2014, at and in the County of Los Angeles, State of California, defendant ALI  
14 TAVAF, being a person required to make, render, sign or verify a tax return for tobacco  
15 distributor license number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns  
16 for the period August 1, 2014 through August 31, 2014, with the intent to defeat or evade an  
17 unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-  
18 consecutive month period, in violation of Revenue and Taxation Code Sections 30472/30480, a  
19 **felony**, in that defendant failed to remit \$301,583 excise tax to the California Department of Tax  
20 and Fee Administration.  
21

22 **COUNT TWENTY-FOUR**

23 **FILING FRAUDULENT REPORT**

24 For a further and separate cause of action, being a different offense from but connected in  
25 its commission as the charges set forth in Counts One through Twenty-Three: On or about  
26 October 25, 2014, at and in the County of Los Angeles, State of California, defendant ALI  
27 TAVAF, being a person required to make, render, sign or verify a tax return for tobacco  
28 distributor license number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns

1 for the period September 1, 2014 through September 30, 2014, with the intent to defeat or evade  
2 an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-  
3 consecutive month period, in violation of Revenue and Taxation Code Sections 30472/30480, a  
4 **felony**, in that defendant failed to remit \$456,825 excise tax to the California Department of Tax  
5 and Fee Administration.

6  
7 **COUNT TWENTY-FIVE**  
8 **FILING FRAUDULENT REPORT**

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-Four: On or about  
11 November 25, 2014, at and in the County of Los Angeles, State of California, defendant ALI  
12 TAVAF, being a person required to make, render, sign or verify a tax return for tobacco  
13 distributor license number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns  
14 for the period October 1, 2014 through October 31, 2014, with the intent to defeat or evade an  
15 unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-  
16 consecutive month period, in violation of Revenue and Taxation Code Sections 30472/30480, a  
17 **felony**, in that defendant failed to remit \$390,524 excise tax to the California Department of Tax  
18 and Fee Administration.

19  
20 **COUNT TWENTY-SIX**  
21 **FILING FRAUDULENT REPORT**

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 Twenty-Five: On or about  
24 December 25, 2014, at and in the County of Los Angeles, State of California, defendant ALI  
25 TAVAF, being a person required to make, render, sign or verify a tax return for tobacco  
26 distributor license number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns  
27 for the period November 1, 2014 through November 30, 2014, with the intent to defeat or evade  
28 an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-



1 consecutive month period, in violation of Revenue and Taxation Code Sections 30472/30480, a  
2 **felony**, in that defendant failed to remit \$421,784 excise tax to the California Department of Tax  
3 and Fee Administration.

4  
5 **COUNT TWENTY-SEVEN**

6 **FILING FRAUDULENT REPORT**

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 Twenty-Six: On or about January  
9 25, 2015, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
10 a person required to make, render, sign or verify a tax return for tobacco distributor license  
11 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period  
12 December 1, 2014 through December 31, 2014, with the intent to defeat or evade an unreported  
13 tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month  
14 period, in violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that  
15 defendant failed to remit \$142,867 excise tax to the California Department of Tax and Fee  
16 Administration.

17  
18 **COUNT TWENTY-EIGHT**

19 **FILING FRAUDULENT REPORT**

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 Twenty-Seven: On or about  
22 February 25, 2015, at and in the County of Los Angeles, State of California, defendant ALI  
23 TAVAF, being a person required to make, render, sign or verify a tax return for tobacco  
24 distributor license number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns  
25 for the period January 1, 2015 through January 31, 2015, with the intent to defeat or evade an  
26 unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-  
27 consecutive month period, in violation of Revenue and Taxation Code Sections 30472/30480, a

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1 **felony**, in that defendant failed to remit \$410,055 excise tax to the California Department of Tax  
2 and Fee Administration.

3  
4 **COUNT TWENTY-NINE**

5 **FILING FRAUDULENT REPORT**

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-Eight: On or about March  
8 25, 2015, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
9 a person required to make, render, sign or verify a tax return for tobacco distributor license  
10 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period  
11 February 1, 2015 through February 28, 2015, with the intent to defeat or evade an unreported tax  
12 liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month  
13 period, in violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that  
14 defendant failed to remit \$481,081 excise tax to the California Department of Tax and Fee  
15 Administration.

16  
17 **COUNT THIRTY**

18 **FILING FRAUDULENT REPORT**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth in Counts One through Twenty-Nine: On or about April  
21 25, 2015, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
22 a person required to make, render, sign or verify a tax return for tobacco distributor license  
23 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period March  
24 1, 2015 through March 31, 2015, with the intent to defeat or evade an unreported tax liability  
25 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
26 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
27 to remit \$603,963 excise tax to the California Department of Tax and Fee Administration.

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**COUNT THIRTY-ONE**

**FILING FRAUDULENT REPORT**

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 Thirty: On or about May 25, 2015, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a person required to make, render, sign or verify a tax return for tobacco distributor license number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period April 1, 2015 through April 30, 2015, with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit \$532,982 excise tax to the California Department of Tax and Fee Administration.

**COUNT THIRTY-TWO**

**FILING FRAUDULENT REPORT**

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 Thirty-One: On or about June 25, 2015, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a person required to make, render, sign or verify a tax return for tobacco distributor license number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period May 1, 2015 through May 31, 2015, with the intent to defeat or evade an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit \$463,194 excise tax to the California Department of Tax and Fee Administration.

**COUNT THIRTY-THREE**

**FILING FRAUDULENT REPORT**

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 Thirty-Two: On or about July 25,

1 2015, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
2 person required to make, render, sign or verify a tax return for tobacco distributor license number  
3 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period June 1, 2015  
4 through June 30, 2015, with the intent to defeat or evade an unreported tax liability exceeding  
5 twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of  
6 Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit  
7 \$435,262 excise tax to the California Department of Tax and Fee Administration.

8  
9 **COUNT THIRTY-FOUR**

10 **FILING FRAUDULENT REPORT**

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 Thirty-Three: On or about August  
13 25, 2015, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
14 a person required to make, render, sign or verify a tax return for tobacco distributor license  
15 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period July 1,  
16 2015 through July 31, 2015, with the intent to defeat or evade an unreported tax liability  
17 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
18 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
19 to remit \$472,811 excise tax to the California Department of Tax and Fee Administration.

20  
21 **COUNT THIRTY-FIVE**

22 **FILING FRAUDULENT REPORT**

23 For a further and separate cause of action, being a different offense from but connected in  
24 its commission as the charges set forth in Counts One through Thirty-Four: On or about  
25 September 25, 2015, at and in the County of Los Angeles, State of California, defendant ALI  
26 TAVAF, being a person required to make, render, sign or verify a tax return for tobacco  
27 distributor license number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns  
28 for the period August 1, 2015 through August 31, 2015, with the intent to defeat or evade an



1 unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-  
2 consecutive month period, in violation of Revenue and Taxation Code Sections 30472/30480, a  
3 **felony**, in that defendant failed to remit \$602,303 excise tax to the California Department of Tax  
4 and Fee Administration.

5  
6 **COUNT THIRTY-SIX**

7 **FILING FRAUDULENT REPORT**

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 Thirty-Five: On or about October  
10 25, 2015, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
11 a person required to make, render, sign or verify a tax return for tobacco distributor license  
12 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period  
13 September 1, 2015 through September 30, 2015, with the intent to defeat or evade an unreported  
14 tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month  
15 period, in violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that  
16 defendant failed to remit \$495,549 excise tax to the California Department of Tax and Fee  
17 Administration.

18  
19 **COUNT THIRTY-SEVEN**

20 **FILING FRAUDULENT REPORT**

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-Six: On or about November  
23 25, 2015, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
24 a person required to make, render, sign or verify a tax return for tobacco distributor license  
25 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period  
26 October 1, 2015 through October 31, 2015, with the intent to defeat or evade an unreported tax  
27 liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month  
28 period, in violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that

1 defendant failed to remit \$149,270 excise tax to the California Department of Tax and Fee  
2 Administration.

3  
4 **COUNT THIRTY-EIGHT**  
5 **FILING FRAUDULENT REPORT**

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 Thirty-Seven: On or about  
8 December 25, 2015, at and in the County of Los Angeles, State of California, defendant ALI  
9 TAVAF, being a person required to make, render, sign or verify a tax return for tobacco  
10 distributor license number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns  
11 for the period November 1, 2015 through November 30, 2015, with the intent to defeat or evade  
12 an unreported tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-  
13 consecutive month period, in violation of Revenue and Taxation Code Sections 30472/30480, a  
14 **felony**, in that defendant failed to remit \$452,890 excise tax to the California Department of Tax  
15 and Fee Administration.

16  
17 **COUNT THIRTY-NINE**  
18 **FILING FRAUDULENT REPORT**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth in Counts One through Thirty-Eight: On or about January  
21 25, 2016, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
22 a person required to make, render, sign or verify a tax return for tobacco distributor license  
23 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period  
24 December 1, 2015 through December 31, 2015, with the intent to defeat or evade an unreported  
25 tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month  
26 period, in violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that  
27 defendant failed to remit \$262,587 excise tax to the California Department of Tax and Fee  
28 Administration.



1 **COUNT FORTY**

2 **FILING FRAUDULENT REPORT**

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 Thirty-Nine: On or about February  
5 25, 2016, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
6 a person required to make, render, sign or verify a tax return for tobacco distributor license  
7 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period  
8 January 1, 2016 through January 31, 2016, with the intent to defeat or evade an unreported tax  
9 liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month  
10 period, in violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that  
11 defendant failed to remit \$86,919 excise tax to the California Department of Tax and Fee  
12 Administration.

13  
14 **COUNT FORTY-ONE**

15 **FILING FRAUDULENT REPORT**

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 Forty: On or about March 25,  
18 2016, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
19 person required to make, render, sign or verify a tax return for tobacco distributor license number  
20 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period February 1,  
21 2016 through February 29, 2016, with the intent to defeat or evade an unreported tax liability  
22 exceeding twenty-five thousand dollars (\$25,000) within a 12-consecutive month period, in  
23 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
24 to remit \$388,514 excise tax to the California Department of Tax and Fee Administration.

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1 2016, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
2 person required to make, render, sign or verify a tax return for tobacco distributor license number  
3 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period May 1, 2016  
4 through May 31, 2016, with the intent to defeat or evade an unreported tax liability exceeding  
5 twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of  
6 Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit  
7 \$492,901 excise tax to the California Department of Tax and Fee Administration.

8  
9 **COUNT FORTY-FIVE**

10 **FILING FRAUDULENT REPORT**

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 Forty-Four: On or about July 25,  
13 2016, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
14 person required to make, render, sign or verify a tax return for tobacco distributor license number  
15 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period June 1, 2016  
16 through June 30, 2016, with the intent to defeat or evade an unreported tax liability exceeding  
17 twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of  
18 Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit  
19 \$271,741 excise tax to the California Department of Tax and Fee Administration.

20  
21 **COUNT FORTY-SIX**

22 **FILING FRAUDULENT REPORT**

23 For a further and separate cause of action, being a different offense from but connected in  
24 its commission as the charges set forth in Counts One through Forty-Five: On or about August  
25 25, 2016, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
26 a person required to make, render, sign or verify a tax return for tobacco distributor license  
27 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period July 1,  
28 2016 through July 31, 2016, with the intent to defeat or evade an unreported tax liability

1 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
2 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
3 to remit \$215,298 excise tax to the California Department of Tax and Fee Administration.

4  
5 **COUNT FORTY-SEVEN**

6 **FILING FRAUDULENT REPORT**

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-Six: On or about September  
9 25, 2016, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
10 a person required to make, render, sign or verify a tax return for tobacco distributor license  
11 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period  
12 August 1, 2016 through August 31, 2016, in violation of Revenue and Taxation Code Section  
13 30472, a **misdemeanor**, in that defendant failed to remit \$13,600 excise tax to the California  
14 Department of Tax and Fee Administration.

15  
16 **COUNT FORTY-EIGHT**

17 **FILING FRAUDULENT REPORT**

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-Seven: On or about October  
20 25, 2016, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
21 a person required to make, render, sign or verify a tax return for tobacco distributor license  
22 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period  
23 September 1, 2016 through September 30, 2016, with the intent to defeat or evade an unreported  
24 tax liability exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month  
25 period, in violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that  
26 defendant failed to remit \$122,560 excise tax to the California Department of Tax and Fee  
27 Administration.

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1 **COUNT FIFTY-ONE**

2 **FILING FRAUDULENT REPORT**

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 Fifty: On or about January 25,  
5 2017, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
6 person required to make, render, sign or verify a tax return for tobacco distributor license number  
7 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period December 1,  
8 2016 through December 31, 2016, with the intent to defeat or evade an unreported tax liability  
9 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
10 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
11 to remit \$148,977 excise tax to the California Department of Tax and Fee Administration.  
12

13 **COUNT FIFTY-TWO**

14 **FILING FRAUDULENT REPORT**

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 Fifty-One: On or about April 25,  
17 2017, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
18 person required to make, render, sign or verify a tax return for tobacco distributor license number  
19 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period January 1,  
20 2017 through March 31, 2017, with the intent to defeat or evade an unreported tax liability  
21 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
22 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
23 to remit \$264,884 excise tax to the California Department of Tax and Fee Administration.  
24

25 **COUNT FIFTY-THREE**

26 **FILING FRAUDULENT REPORT**

27 For a further and separate cause of action, being a different offense from but connected in  
28 its commission as the charges set forth in Counts One through Fifty-Two: On or about July 25,



1 2017, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being a  
2 person required to make, render, sign or verify a tax return for tobacco distributor license number  
3 CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period April 1, 2017  
4 through June 30, 2017, with the intent to defeat or evade an unreported tax liability exceeding  
5 twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in violation of  
6 Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed to remit  
7 \$1,208,960 excise tax to the California Department of Tax and Fee Administration.

8  
9 **COUNT FIFTY-FOUR**

10 **FILING FRAUDULENT REPORT**

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 Fifty-Three: On or about October  
13 25, 2017, at and in the County of Los Angeles, State of California, defendant ALI TAVAF, being  
14 a person required to make, render, sign or verify a tax return for tobacco distributor license  
15 number CP STF 05-0004827, unlawfully filed false or fraudulent tax returns for the period July 1,  
16 2017 through September 30, 2017, with the intent to defeat or evade an unreported tax liability  
17 exceeding twenty-five thousand dollars (\$25,000) within any 12-consecutive month period, in  
18 violation of Revenue and Taxation Code Sections 30472/30480, a **felony**, in that defendant failed  
19 to remit \$89,084 excise tax to the California Department of Tax and Fee Administration.

20  
21 **SPECIAL ALLEGATION ONE**

22 **WHITE COLLAR CRIME ENHANCEMENT IN EXCESS OF \$500,000**

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

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