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7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SOLANO
10

11 **THE PEOPLE OF THE STATE OF**
12 **CALIFORNIA,**

13 Plaintiff,

14 v.

15 **RANDHAWA, IQBAL SINGH,**
16

17 Defendant.
18

Case No. FCR347029

THIRD AMENDED INFORMATION

19 ROB BONTA, ATTORNEY GENERAL OF THE STATE OF CALIFORNIA, upon oath
20 of the undersigned, upon information and belief, complains against the Defendant **IQBAL**
21 **SINGH RANDHAWA** for the crimes as follows:
22

23 **COUNT 1**

24 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

25 On or around July 31, 2017, at and in the County of Solano in the State of California,
26 Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND THEFT
27 EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the State of
28 California, in that said Defendant while acting as a Travel Agent did unlawfully and fraudulently

1 appropriate to a use and purpose not in the due and lawful execution of his trust, property which
2 he had in his possession and under his control by virtue of his trust and did unlawfully secrete
3 said property from S [REDACTED] S [REDACTED] of Tracy CA with a fraudulent intent to appropriate it to
4 such a use and purpose contrary to Penal Code section 487(a), said property being of a value
5 exceeding Nine Hundred Fifty (\$950) to wit: \$4730.

6
7 **COUNT 2**

8 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

9 On or around May 22, 2017, at and in the County of Solano in the State of California,
10 Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND THEFT
11 EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the State of
12 California, in that said Defendant while acting as a Travel Agent did unlawfully and fraudulently
13 appropriate to a use and purpose not in the due and lawful execution of his trust, property which
14 he had in his possession and under his control by virtue of his trust and did unlawfully secrete
15 said property from B [REDACTED] S [REDACTED] of Newark CA with a fraudulent intent to appropriate it to
16 such a use and purpose contrary to Penal Code section 487(a), said property being of a value
17 exceeding Nine Hundred Fifty (\$950) to wit: \$4960.

18
19 **COUNT 4**

20 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

21 On or around November 14, 2017, at and in the County of Solano in the State of California,
22 Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND THEFT
23 EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the State of
24 California, in that said Defendant while acting as a Travel Agent did unlawfully and fraudulently
25 appropriate to a use and purpose not in the due and lawful execution of his trust, property which
26 he had in his possession and under his control by virtue of his trust and did unlawfully secrete
27 said property from S [REDACTED] R [REDACTED] of Union City CA with a fraudulent intent to appropriate it to
28

1 such a use and purpose contrary to Penal Code section 487(a), said property being of a value
2 exceeding Nine Hundred Fifty (\$950) to wit: **\$3900.**

3
4 **COUNT 5**

5 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

6 On or around May 17, 2017, at and in the County of Solano in the State of California,
7 Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND THEFT
8 EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the State of
9 California, in that said Defendant while acting as a Travel Agent did unlawfully and fraudulently
10 appropriate to a use and purpose not in the due and lawful execution of his trust, property which
11 he had in his possession and under his control by virtue of his trust and did unlawfully secrete
12 said property from R ■■■ P ■■■ of Pittsburg CA with a fraudulent intent to appropriate it to
13 such a use and purpose contrary to Penal Code section 487(a), said property being of a value
14 exceeding Nine Hundred Fifty (\$950) to wit: **\$10,500.**

15
16 **COUNT 6**

17 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

18 On or around December 12, 2017, at and in the County of Solano in the State of California,
19 Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND THEFT
20 EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the State of
21 California, in that said Defendant while acting as a Travel Agent did unlawfully and fraudulently
22 appropriate to a use and purpose not in the due and lawful execution of his trust, property which
23 he had in his possession and under his control by virtue of his trust and did unlawfully secrete
24 said property from T ■■■ M ■■■ of Woodland CA with a fraudulent intent to appropriate it
25 to such a use and purpose contrary to Penal Code section 487(a), said property being of a value
26 exceeding Nine Hundred Fifty (\$950) to wit: **\$7540.**

1 **COUNT 7**

2 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

3 On or around February 2, 2018, at and in the County of Solano in the State of California,
4 Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND THEFT
5 EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the State of
6 California, in that said Defendant while acting as a Travel Agent did unlawfully and fraudulently
7 appropriate to a use and purpose not in the due and lawful execution of his trust, property which
8 he had in his possession and under his control by virtue of his trust and did unlawfully secrete
9 said property from J [REDACTED] S [REDACTED] of Turlock CA with a fraudulent intent to appropriate it to such
10 a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding
11 Nine Hundred Fifty (\$950) to wit: **\$1210**.

12
13 **COUNT 9**

14 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

15 On or around November 22, 2017, at and in the County of Solano in the State of California,
16 Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND THEFT
17 EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the State of
18 California, in that said Defendant while acting as a Travel Agent did unlawfully and fraudulently
19 appropriate to a use and purpose not in the due and lawful execution of his trust, property which
20 he had in his possession and under his control by virtue of his trust and did unlawfully secrete
21 said property from J [REDACTED] R [REDACTED] of Sioux City IA with a fraudulent intent to appropriate it
22 to such a use and purpose contrary to Penal Code section 487(a), said property being of a value
23 exceeding Nine Hundred Fifty (\$950) to wit: **\$3500**.

24
25 **COUNT 13**

26 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

27 On or around April 15, 2018, at and in the County of Solano in the State of California,
28 Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND THEFT

1 EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the State of
2 California, in that said Defendant while acting as a Travel Agent did unlawfully and fraudulently
3 appropriate to a use and purpose not in the due and lawful execution of his trust, property which
4 he had in his possession and under his control by virtue of his trust and did unlawfully secrete
5 said property from S [REDACTED] S [REDACTED] of Elk Grove CA with a fraudulent intent to appropriate it to
6 such a use and purpose contrary to Penal Code section 487(a), said property being of a value
7 exceeding Nine Hundred Fifty (\$950) to wit: \$2000.

8
9 **COUNT 14**

10 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

11 On or around January 24, 2017, at and in the County of Solano in the State of California,
12 Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND THEFT
13 EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the State of
14 California, in that said Defendant while acting as a Travel Agent did unlawfully and fraudulently
15 appropriate to a use and purpose not in the due and lawful execution of his trust, property which
16 he had in his possession and under his control by virtue of his trust and did unlawfully secrete
17 said property from S [REDACTED] S [REDACTED] of Tracy CA with a fraudulent intent to appropriate it to such a
18 use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding
19 Nine Hundred Fifty (\$950) to wit: \$48,300.

20
21 **COUNT 15**

22 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

23 On or around March 1, 2018, at and in the County of Solano in the State of
24 California, Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND
25 THEFT EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the
26 State of California, in that said Defendant while acting as a Travel Agent did unlawfully and
27 fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust,
28 property which he had in his possession and under his control by virtue of his trust and did

1 unlawfully secrete said property from B [REDACTED] B [REDACTED] of Hayward CA with a fraudulent intent
2 to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property
3 being of a value exceeding Nine Hundred Fifty (\$950) to wit: **\$2623**.

4
5 **COUNT 16**

6 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

7 On or between February 1, 2018 and March 26, 2018, at and in the County of Solano in the
8 State of California, Defendant IQBAL SINGH RANDHAWA did commit a felony, namely
9 GRAND THEFT EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE
10 of the State of California, in that said Defendant while acting as a Travel Agent did unlawfully
11 and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust,
12 property which he had in his possession and under his control by virtue of his trust and did
13 unlawfully secrete said property from SkyBird Travel of Southfield MI with a fraudulent intent
14 to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property
15 being of a value exceeding Nine Hundred Fifty (\$950) to wit: **\$38,423.14**.

16
17 **COUNT 18**

18 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

19 On or between September 27, 2019, at and in the County of Solano in the State of
20 California, Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND
21 THEFT EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the
22 State of California, in that said Defendant while acting as a Travel Agent did unlawfully and
23 fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust,
24 property which he had in his possession and under his control by virtue of his trust and did
25 unlawfully secrete said property from J [REDACTED] B [REDACTED] of Fresno CA with a fraudulent intent to
26 appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property
27 being of a value exceeding Nine Hundred Fifty (\$950) to wit: **\$6750**.

1 **COUNT 19**

2 **GRAND THEFT/EMBEZZLEMENT Penal Code §§ 487/506**

3 On or between January 24, 2020, at and in the County of Solano in the State of California,
4 Defendant IQBAL SINGH RANDHAWA did commit a felony, namely GRAND THEFT
5 EMBEZZLEMENT, a violation of SECTION 487/506 OF THE PENAL CODE of the State of
6 California, in that said Defendant while acting as a Travel Agent did unlawfully and fraudulently
7 appropriate to a use and purpose not in the due and lawful execution of his trust, property which
8 he had in his possession and under his control by virtue of his trust and did unlawfully secrete
9 said property from M [REDACTED] W [REDACTED] of Stockton CA with a fraudulent intent to appropriate it
10 to such a use and purpose contrary to Penal Code section 487(a), said property being of a value
11 exceeding Nine Hundred Fifty (\$950) to wit: **\$2240**.

12
13 **COUNT 20**

14 **FAILURE TO PROVIDE TRAVEL SERVICES OR RETURN MONEYS**

15 **Business & Professions Code § 17550.14(a)(1)**

16 On or about and between January 1, 2017 and September 27, 2019, at and in the County of
17 Solano in the State of California, defendant IQBAL SINGH RANDHAWA did commit a felony,
18 namely FAILURE TO PROVIDE TRAVEL SERVICES OR RETURN MONEYS, a violation of
19 section 17550.14(a)(1) of the Business and Professions Code of the State of California, in that
20 said defendant did unlawfully, being a "Seller of Travel," fail to promptly return to a passenger all
21 moneys paid for services not performed and goods not delivered in accordance with a contract.

22 It is further alleged that the above "Seller of Travel" obtained \$2350.00 and more in a
23 consecutive 12-month period from all persons and \$950.00 and more from one person in a 12
24 month period.

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1 **COUNT 21**

2 **ENCUMBERING MONEY FROM TRUST ACCOUNT**

3 **Business & Professions Code § 17550.15(c)**

4 On or about and between January 1, 2017 and September 27, 2019, at and in the County of
5 Solano in the State of California, defendant IQBAL SINGH RANDHAWA did commit a felony,
6 namely ENCUMBERING MONEY FROM TRUST ACCOUNT, a violation of section
7 17550.15(c) of the Business and Professions Code of the State of California, in that said
8 defendant did unlawfully, being a "Seller of Travel," fail to deposit payments for travel services
9 into a trust ACCOUNT, encumbered the corpus of the trust ACCOUNT and withdrew money
10 therefrom.

11 It is further alleged that the above "Seller of Travel" obtained \$2350.00 and more in a
12 consecutive 12-month period from all persons and \$950.00 and more from one person in a 12-
13 month period.

14
15 **COUNT 22**

16 **SPEC ALLEGATION – AGGRAVATED WHITE COLLAR CRIME**

17 **Penal Code § 186.11(a)**

18 It is further alleged as to Count 1-19, that the offenses set forth in Counts 1 through 19 are
19 related felonies, a material element of which is fraud and embezzlement, which involve a pattern
20 of related felony conduct, and the pattern of related felony conduct involves the taking of more
21 than One Hundred Thousand Dollars (\$100,000), to wit: \$147,617.14.

22
23 **COUNT 23**

24 **OFFENSE WHILE ON BAIL ENHANCEMENT CPC § 12022.1**

25 It is further alleged as to COUNTS 18 and 19, that at the time of the commission of the
26 above offense, the defendant was released from custody on bail or Own Recognizance in this case
27 within the meaning of Penal Code section 12022.1.

1 Pursuant to Penal Code section 1054.5(B), the People are hereby informally requesting that
2 defense counsel provide discovery to the People as required by Penal Code section 1054.3, and
3 pursuant to the provisions of Penal Code section 1054.7
4

5 **COUNT 24**

6 It is further alleged as to counts 1-19 that the charged crimes evinced a high degree of
7 callousness, within the meaning of California Rules of Court Rule 4.421(a)(1).
8

9 **COUNT 25**

10 It is further alleged as to counts 1-15 and 17-19 that the victims were particularly
11 vulnerable, within the meaning of California Rules of Court Rule 4.421(a)(3).
12

13 **COUNT 26**

14 It is further alleged as to counts 1-19 that the charged crime took planning, sophistication,
15 and professionalism within the meaning California of Rule of Court 4.421(a)(8).
16

17 **COUNT 27**

18 It is further alleged as to counts 1-21 that the charged crime was a great monetary value
19 withing the meaning of California Rule of Court 4.421(a)(9).
20

21 **COUNT 28**

22 It is further alleged as to counts 1-19 that the charged crime took advantage of his position
23 of trust withing the meaning of California Rule of Court 4.421(a)(11).
24

25 **COUNT 29**

26 It is further alleged as to counts 1-21 that the Defendants crimes has priors and that his
27 crimes are increasing in seriousness, withing the meaning of California Rule of Court 4.421(b)(2).
28

1 **COUNT 30**

2 It is further alleged as to counts 1-21 that the Defendant has served a prior commitment in
3 prison or county jail, within the meaning of California Rule of Court 4.421(b)(3).
4

5 **COUNT 31**

6 It is further alleged as to counts 1-19 that the Defendant's crime was aggravated by factors
7 reasonably relating to the defendant and the circumstances under which the crime was committed,
8 within the meaning of California Rule of Court 4.421(c), to wit: the defendant previously engaged
9 in similar conduct for which he was criminally convicted.
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12 Dated: January 6, 2025

Respectfully submitted,

13
14 ROB BONTA
Attorney General of California

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16 

17 DAVID CHIANG
18 Deputy Attorney General
19 *Attorneys for the People of the
State of California*

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