| 1 | ROB BONTA Attorney General of California | |
|----------|---|---|
| 2 | SUSAN ŠCHWARTZ Supervising Deputy Attorney General | |
| 3 | EDWARD J. SKELLY Deputy Attorney General | |
| 4 | State Bar No. 150579 RYAN TOOMEY | |
| 5 | Deputy Attorney General State Bar No. 319127 | |
| 6 | 300 South Spring Street, Suite 1702 Los Angeles, CA 90013-1230 | |
| 7 | Telephone: (213) 269-3344 Fax: (916) 731-3641 | |
| 8 | E-mail: Ryan.Toomey@doj.ca.gov Attorneys for the People | |
| 9 | SUPERIOR COURT OF TH | E STATE OF CALIFORNIA |
| 10 | COUNTY OF I | OS ANGELES |
| 11 | | |
| 12 | | 25VWCF02062 |
| 13 | | |
| 14 | THE PEOPLE OF THE STATE OF CALIFORNIA, | Case No. |
| 15 | the People, | FELONY COMPLAINT FOR ARREST WARRANT AND EXTRADITION |
| 16 | v. | FILED |
| 17 | 1. THIEN KIM HUYNH NGUYEN | Superior Court of California County of Los Angeles |
| 18 | 1. THIEN KIM HUYNH NGUTEN | NOV 17 2025 |
| 19 | a DUNG HUVAH | David W. Slayton, Executive Officer/Clerk of Court |
| 20 | 2. PHUC HUYNH Defendants. | By: A. Cervantes, Deputy |
| 21 | | |
| 22 | | |
| 23 | | ornia, through Deputy Attorneys General Edward |
| 24 | J. Skelly and Ryan Toomey, accuses the above-r | named defendants of the following offenses, |
| 25 | which are connected in their commission: | |
| 26 | | |
| 22 | | |
| 27 28 | | |

| 1 | COUNT 1 |
|----|---|
| 2 | GRAND THEFT |
| 3 | On or between May 12, 2020, and April 3, 2022, at and in the County of Los Angeles, the |
| 4 | crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was |
| 5 | committed by defendants THIEN KIM HUYNH NGUYEN and PHUC HUYNH, who did |
| 6 | knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, |
| 7 | labor and real and personal property by fraud from , specifically, money, which had a |
| 8 | value exceeding nine hundred fifty dollars (\$950); to wit: \$805,967. |
| 9 | COUNT 2 |
| 10 | GRAND THEFT |
| 11 | On or between October 11, 2019, and October 27, 2022, at and in the County of Los |
| 12 | Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a |
| 13 | Felony, was committed by defendants THIEN KIM HUYNH NGUYEN and PHUC HUYNH, |
| 14 | who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain |
| 15 | money, labor and real and personal property by fraud from and and |
| 16 | specifically, money, which had a value exceeding nine hundred fifty dollars (\$950); to wit: |
| 17 | \$296,229. |
| 18 | COUNT 3 |
| 19 | GRAND THEFT |
| 20 | On or between February 23, 2019, and June 3, 2023, at and in the County of Los Angeles, |
| 21 | the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was |
| 22 | committed by defendants THIEN KIM HUYNH NGUYEN and PHUC HUYNH, who did |
| 23 | knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, |
| 24 | labor and real and personal property by fraud from , specifically, money, which had |
| 25 | a value exceeding nine hundred fifty dollars (\$950); to wit: \$281,433. |
| 26 | COUNT 4 |
| 27 | GRAND THEFT |
| 28 | On or between October 2022 and January 20, 2023, at and in the County of Los Angeles, |

| 1 | the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was |
|----|--|
| 2 | committed by defendants THIEN KIM HUYNH NGUYEN and PHUC HUYNH, who did |
| 3 | knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, |
| 4 | labor and real and personal property by fraud from , specifically, money, which had a |
| 5 | value exceeding nine hundred fifty dollars (\$950); to wit: \$105,000. |
| 6 | COUNT 5 |
| 7 | GRAND THEFT |
| 8 | On or between December 2022 and January 12, 2023, at and in the County of Los |
| 9 | Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a |
| 10 | Felony, was committed by defendant THIEN KIM HUYNH NGUYEN, who did knowingly and |
| 11 | designedly, by a false and fraudulent representation and pretense, obtain money, labor and real |
| 12 | and personal property by fraud from , specifically, money, which had a value |
| 13 | exceeding nine hundred fifty dollars (\$950); to wit: \$27,100. |
| 14 | COUNT 6 |
| 15 | GRAND THEFT |
| 16 | On or between July 2022 and September 6, 2022, at and in the County of Los Angeles, the |
| 17 | crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was |
| 18 | committed by defendant THIEN KIM HUYNH NGUYEN, who did knowingly and designedly, |
| 19 | by a false and fraudulent representation and pretense, obtain money, labor and real and personal |
| 20 | property by fraud from specifically, money, which had a value exceeding nine hundred |
| 21 | fifty dollars (\$950); to wit: \$90,000. |
| 22 | COUNT 7 |
| 23 | GRAND THEFT |
| 24 | On or between January 8, 2020, and March 27, 2023, at and in the County of Los Angeles, the |
| 25 | crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was |
| 26 | committed by defendants THIEN KIM HUYNH NGUYEN and PHUC HUYNH, who did |
| 27 | knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, |
| 28 | labor and real and personal property by fraud from , in violation of Penal Code |
| | |

| 1 | Section 48 /(a), specifically, money, which had a value exceeding fille fluidred fifty dollars |
|-----|--|
| 2 | (\$950); to wit: \$194,147. |
| 3 | COUNT 8 |
| 4 | GRAND THEFT |
| 5 | On or about September 9, 2020, at and in the County of Los Angeles, the crime of |
| 6 | GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by |
| 7 | defendant THIEN KIM HUYNH NGUYEN, who did knowingly and designedly, by a false and |
| 8 | fraudulent representation and pretense, obtain money, labor and real and personal property by |
| 9 | fraud from , specifically, money, which had a value exceeding nine hundred |
| 0 | fifty dollars (\$950); to wit: \$17,000. |
| 1 | COUNT 9 |
| 2 | GRAND THEFT |
| 3 | On or between March 2, 2022 and August 5, 2022, at and in the County of Los Angeles, |
| 4 | the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was |
| 5 | committed by defendant THIEN KIM HUYNH NGUYEN, who did knowingly and designedly, |
| 6 | by a false and fraudulent representation and pretense, obtain money, labor and real and personal |
| 7 | property by fraud from specifically, money, which had a value exceeding |
| 8 | nine hundred fifty dollars (\$950); to wit: \$123,775. |
| 9 | COUNT 10 |
| 20 | GRAND THEFT |
| 21 | On or between March 2022, and December 2022, at and in the County of Los Angeles, the |
| 22 | crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was |
| 23 | committed by defendant THIEN KIM HUYNH NGUYEN, who did knowingly and designedly, |
| 24 | by a false and fraudulent representation and pretense, obtain money, labor and real and personal |
| 2.5 | property by fraud from , specifically, money, which had a value exceeding nine |
| 26 | hundred fifty dollars (\$950); to wit: \$253,000. |
| 27 | 111 |
| 28 | 111 |

COUNT 11

GRAND THEFT

On or between September 25, 2022, and September 27, 2022, at and in the County of Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendant THIEN KIM HUYNH NGUYEN, did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, labor and real and personal property by fraud from personal property, specifically, money, which had a value exceeding nine hundred fifty dollars (\$950); to wit: \$5,000.

COUNT 12

GRAND THEFT

On or between July 12, 2023, and July 17, 2023, at and in the County of Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants THIEN KIM HUYNH NGUYEN and PHUC HUYNH, who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, labor and real and personal property by fraud from personal property, specifically, money, which had a value exceeding nine hundred fifty dollars (\$950); to wit \$38,000.

SPECIAL ALLEGATION ONE

WHITE COLLAR CRIME ENHANCEMENT IN EXCESS OF \$500,000 (Penal Code Sections 186.11(a)(2))

| 1 | NOTICE: Prison custody time is to be served in state prison if the enhancement pursuant to Penal |
|----|--|
| 2 | Code section 186.11 is imposed as part of the sentence for the above offense, within the meaning |
| 3 | of Penal Code section 1170(h)(3). |
| 4 | SPECIAL ALLEGATION TWO |
| 5 | EXCESSIVE TAKING ENHANCEMENT IN EXCESS OF \$1,000,000] |
| 6 | (Penal Code Sections 12022.6(a)(3)) |
| 7 | It is further alleged as to counts 1 through 12 that during the commission and attempted |
| 8 | commission of the above felony, defendants THIEN KIM HUYNH NGUYEN and PHUC |
| 9 | HUYNH took, damaged, and destroyed property with a value exceeding one million dollars |
| 10 | (\$1,000,000), within the meaning of Penal Code section 12022.6(a)(3). |
| 11 | SPECIAL ALLEGATION THREE |
| 12 | AGGRAVATING CIRCUMSTANCES |
| 13 | (California Rules of Court Rule 4.421(a)) |
| 14 | It is further alleged as to Counts 1 through 12 that the victims of the above offenses were |
| 15 | particularly vulnerable, within the meaning of California Rules of Court Rule 4.421(a)(3). |
| 16 | It is further alleged as to Counts 1 through 12 that the manner in which Defendant Nguyer |
| 17 | and Defendant Huynh carried out the above offenses indicates planning, sophistication, or |
| 18 | professionalism, within the meaning of California Rules of Court Rule 4.421(a)(8). |
| 19 | It is further alleged as to Counts 1 through 12 that the crime involved an attempted and |
| 20 | actual taking and damage of great monetary value within the meaning of California Rules of |
| 21 | Court Rule 4.421(a)(9). |
| 22 | SPECIAL ALLEGATION FOUR |
| 23 | STATUTE OF LIMITATIONS |
| 24 | (Penal Code Sections 803(c), 801.5) |
| 25 | It is further alleged that the violations enumerated in this Complaint were not discovered |
| 26 | and could not reasonably have been discovered by the victims or law enforcement before |
| 27 | December 1, 2022. |
| 28 | |

Background Facts

Defendants Nguyen and Huynh are prominent members of the Vietnamese community in the San Fernando Valley of Los Angeles and have resided there for approximately 20 years. Beginning in 2019, Defendants Nguyen and Huynh solicited money from friends and family within the community to be used as an "investment" and promised that the funds would be repaid with interest. Defendants Nguyen and Huynh used many different misrepresentations to induce the victims to give them money. This included calling the payments an "investment" with some victims and a "loan" to other victims.

Victims' Discovery

The following victims loaned money to the defendants on the offense dates listed in each count:

As to Count 1, was first contacted by Defendant Nguyen regarding a loan in May 2020. As a result of Defendant Nguyen's misrepresentations, made bank check payments to Defendant Nguyen in the amount of \$539,500. The made wire transfer payments to Defendant Nguyen in the amount of \$113,160. The made Zelle payments to Defendant Nguyen in the amount of \$153,307. She first suspected that Defendant Nguyen engaged in criminal conduct on November 12, 2022, after discovering that the repayment checks issued by Defendant Nguyen bounced. Prior to that date, she had no reason to believe that she had been the victim of a crime.

As to Count 2, and were first contacted by Defendant Nguyen regarding an investment opportunity in October 2019. As a result of Defendant Nguyen's misrepresentations, made bank check payments to Defendant Nguyen in the amount of \$193,763. The made bank check payments to Defendant Nguyen in the amount of \$7,500. The made cash payments to Defendant Nguyen in the amount of \$99,237. The made Zelle payments to Defendant Nguyen in the amount of \$20,100. The first suspected that Defendant Nguyen engaged in criminal conduct in February 2023 when she defaulted on the loan and failed to pay the agreed-upon investment payments. Prior to that date, they had no reason to believe that they had been the victim of a crime.

| 1 | made Venmo payments to Defendants Nguyen and Huynh in the amount of \$20,340. |
|-----|--|
| 2 | Hang Thu Vo made bank check payments to Defendant Nguyen in the amount of \$5,250. |
| 3 | made cash payments to Defendant Nguyen in the amount of \$73,000. |
| 4 | Zelle payments to Defendant Nguyen in the amount of \$95,557. |
| 5 | Defendant Nguyen engaged in criminal conduct on May 12, 2023, when she did not receive her |
| 6 | return on investment as promised by Defendant Nguyen. Prior to that date, she had no reason to |
| 7 | believe that she had been the victim of a crime. |
| 8 | As to Count 8, was first approached by Defendant Nguyen regarding an |
| 9 | investment in 2021. As a result of Defendant Nguyen's misrepresentations, |
| 0 | made cash payments to Defendant Nguyen in the amount of \$17,000. |
| 1 | suspected that Defendant Nguyen engaged in criminal conduct on June 22, 2023, when he did not |
| 2 | receive his return on investment as promised by Defendant Nguyrn. Prior to that date, he had no |
| 13 | reason to believe that he had been the victim of a crime. |
| 4 | As to Count 9, was first approached by Defendant Nguyen regarding a |
| 5 | business deal in January 2022. As a result of Defendant Nguyen's misrepresentations, |
| 6 | made bank check payments to Defendant Nguyen in the amount of \$123,775. |
| 7 | first suspected that Defendant Nguyen engaged in criminal conduct on November 28, |
| 8 | 2023, when she did not receive her return on investment as promised by Defendant Nguyen. |
| 9 | Prior to that date, she had no reason to believe that she had been the victim of a crime. |
| 0.0 | As to Count 10, contacted Defendant Nguyen regarding a business deal in |
| 21 | 2022. As a result of Defendant Nguyen's misrepresentations, made cash payments to |
| 22 | Defendant Nguyen in the amount of \$253,000. |
| 23 | engaged in criminal conduct in June 2023, when she did not receive her return on investment as |
| 24 | promised by Defendant Nguyen. Prior to that date, she had no reason to believe that she had been |
| 5 | the victim of a crime. |
| 26 | As to Count 11, was first approached by Defendant Nguyen regarding a nail |
| 7 | salon business investment in August 2022. As a result of Defendant Nguyen's misrepresentations, |
| 8 | made Zelle payments to Defendant Nguyen in the amount of \$5,000. |

DECLARATION 1 I declare under the penalty of perjury under the laws of the State of California that the 2 foregoing is true and correct, and that this complaint consists of 12 counts. 3 Executed this Thirteenth Day of November 2025, in Los Angeles, California. 4 5 RYAN TOOMEY 6 DECLARANT AND COMPLAINANT 7 8 9 Respectfully submitted, Dated: November 13, 2025 10 ROB BONTA Attorney General of California 11 SUSAN SCHWARTZ Supervising Deputy Attorney General 12 13 14 15 RYAN TOOMEY Deputy Attorney General 16 Attorneys for the People 17 I/O: Kimberly Santander PHONE NO: AGENCY: LAPD 18 PRELIM TIME EST: 3 days 19 20 21 22 23 24 25 26 27

28