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**FILED**  
ALAMEDA COUNTY

DEC 10 2014

CLERK OF THE SUPERIOR COURT  
By *Mina Hill* Deputy

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 IN AND FOR THE COUNTY OF ALAMEDA

11 *Def: DRW 533 Pen: 435 2021*

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

14 Plaintiff,

15 v.

16 **WEI SI KUANG DOB 8/16/1959**  
17 **JIMMY GONG LEE 12/12/1959**  
18 **RONG LIU 6/23/1977**  
19 **TOM LOI 10/30/1956**

20 Defendants.

Case No. *001 028 D*

**CRIMINAL COMPLAINT**

Date:  
Time:  
Dept:

21 I, the undersigned, say on information and belief, that in the County of Alameda, State of  
22 California:

23 **COUNT ONE**

24 **(Penal Code section 182/266i(a))**

25 On or between January 1, 2013 and June 30, 2014, in the County of Alameda,  
26 **DEFENDANTS KUANG, LEE, LIU and LOI** did unlawfully commit the crime of  
27 **CONSPIRACY** in violation of section 182(a)(1) of the Penal Code in that said Defendants did  
28 unlawfully conspire together with each other and with others whose identities are unknown, to

1 commit the crime of pandering, in violation of Section 266i(a) of the Penal Code, a felony; and  
2 that pursuant to and for the purposes of carrying out the objectives of the aforesaid conspiracy,  
3 the said defendants committed the following overt acts throughout the alleged time period:

4 Overt Act 1

5  
6 Defendants LIU and LEE owned Acucare Oriental Massage located at 3900 Adeline Street,  
7 Emeryville, CA. LIU and LEE allowed Acucare to be used as a brothel where as many as five  
8 females were available daily to provide sexual services for money to customers.

9 Overt Act 2

10  
11 Defendant LIU facilitated a rotation of young women who were used as prostitutes inside  
12 Acucare. Each young woman worked for approximately two weeks before being replaced.

13 Overt Act 3

14  
15 Defendant KUANG worked at the front desk at Acucare on a daily basis. He buzzed in  
16 customers, monitored security cameras, provided condoms to the females, collected cash for  
17 "massages," and then collected a payout from the females for each day they worked at the  
18 brothel.

19 Overt Act 4

20  
21 Defendant LOI bribed an Emeryville Police Department captain, who was serving in an  
22 undercover capacity and posing as a corrupt police officer. On multiple occasions, in an attempt  
23 to persuade the Undercover Officer not to investigate or shut-down Acucare Massage, LOI  
24 provided him with bribes. Specifically, LOI provided the Undercover Officer with roughly \$500  
25 for each female working at the Acucare for a total of roughly \$2000 per month. Over the course  
26 of the conspiracy, LOI provided the Undercover Officer with a total of approximately \$24,000 in  
27 bribes in order to keep Acucare in business.

28 ///

1 ///

2

Overt Act 5

3

4

Defendant LEE provided this cash to LOI each month, with the intention that it be used to pay off law enforcement so that their illegal business operation could continue to thrive.

5

6

7

**COUNT TWO**

8

**(Penal Code section 266i(a)(3))**

9

10

For a further and separate cause of action, being a different offense from, but connected in its commission with, the charge set forth above, on or about June 5, 2014, in the County of Alameda, DEFENDANT KUANG did unlawfully commit the crime of pandering, in violation of Penal Code section 266i(a)(3), by procuring a place for another person, Chun W., a house of prostitution, located at 3900 Adeline Street, Emeryville, CA.

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12

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14

15

**COUNT THREE**

16

**(Penal Code section 266i(a)(3))**

17

18

For a further and separate cause of action, being a different offense from, but connected in its commission with, the charge set forth above, on or about June 5, 2014, in the County of Alameda, DEFENDANT KUANG did unlawfully commit the crime of pandering, in violation of Penal Code section 266i(a)(3), by procuring a place for another person, Yok Q., a house of prostitution, located at 3900 Adeline Street, Emeryville, CA.

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22

23

**COUNT FOUR**

24

**(Penal Code section 266i(a)(3))**

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26

For a further and separate cause of action, being a different offense from, but connected in its commission with, the charge set forth above, on or about June 5, 2014, in the County of Alameda, DEFENDANT KUANG did unlawfully commit the crime of pandering, in violation of

27

28

1 Penal Code section 266i(a)(3), by procuring a place for another person, Xiang W., a house of  
2 prostitution, located at 3900 Adeline Street, Emeryville, CA.

3  
4 **COUNT FIVE**

5 **(Penal Code section 266i(a)(3))**

6 For a further and separate cause of action, being a different offense from, but connected in  
7 its commission with, the charge set forth above, on or about June 5, 2014, in the County of  
8 Alameda, DEFENDANTS KUANG and LIU did unlawfully commit the crime of pandering, in  
9 violation of Penal Code section 266i(a)(3), by procuring a place for another person, Hee C., a  
10 house of prostitution, located at 3900 Adeline Street, Emeryville, CA.

11  
12 **COUNT SIX**

13 **(Penal Code section 266i(a)(3))**

14 For a further and separate cause of action, being a different offense from, but connected in  
15 its commission with, the charge set forth above, on or about May 28, 2014 through June 5, 2014,  
16 in the County of Alameda, DEFENDANTS KUANG and LIU did unlawfully commit the crime  
17 of pandering, in violation of Penal Code section 266i(a)(3), by procuring a place for another  
18 person, Woo C., a house of prostitution, located at 3900 Adeline Street, Emeryville, CA.

19  
20 **COUNT SEVEN**

21 **(Penal Code section 266h(a))**

22 For a further and separate cause of action, being a different offense from, but connected in  
23 its commission with, the charge set forth above, on or about May 28, 2014 through June 5, 2014,  
24 in the County of Alameda, DEFENDANTS KUANG and LIU did unlawfully commit the crime  
25 of pimping, in violation of Penal Code section 266h(a), in that said Defendants, knowing Woo C.,  
26 to be a prostitute, did live and derive support and maintenance in whole or in part from the  
27 earnings and proceeds of said prostitution or from money loaned to or advanced to and charged  
28

1 against said prostitute by a keeper manager and inmate of a house and other place where  
2 prostitution was practiced or allowed.

3 **COUNT EIGHT**

4 **(Penal Code section 266h(a))**

5 For a further and separate cause of action, being a different offense from, but connected in  
6 its commission with, the charge set forth above, on or about May 28, 2014 through June 5, 2014,  
7 in the County of Alameda, DEFENDANTS KUANG and LIU did unlawfully commit the crime  
8 of pimping, in violation of Penal Code section 266h(a), in that said Defendants, knowing Hee C.,  
9 to be a prostitute, did live and derive support and maintenance in whole or in part from the  
10 earnings and proceeds of said prostitution or from money loaned to or advanced to and charged  
11 against said prostitute by a keeper manager and inmate of a house and other place where  
12 prostitution was practiced or allowed.

13  
14 NOTICE: Penal Code 1203.065(a) prohibits a grant of probation for the above charged offenses.

15  
16 **COUNT NINE**

17 **(Penal Code section 67)**

18 For a further and separate cause of action, being a different offense from, but  
19 connected in its commission with, the charges set forth above, on or about March 20, 2013, in the  
20 County of Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery,  
21 in violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to  
22 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
23 Undercover Officer, give and offer to give a bribe.

24  
25 **COUNT TEN**

26 **(Penal Code section 67)**

27 For a further and separate cause of action, being a different offense from, but  
28 connected in its commission with, the charges set forth above, on or about May 18, 2013, in the

1 County of Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery,  
2 in violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to  
3 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
4 Undercover Officer, give and offer to give a bribe.

5  
6 **COUNT ELEVEN**

7 **(Penal Code section 67)**

8 For a further and separate cause of action, being a different offense from, but  
9 connected in its commission with, the charges set forth above, on or about June 13, 2013, in the  
10 County of Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery,  
11 in violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to  
12 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
13 Undercover Officer, give and offer to give a bribe.

14  
15 **COUNT TWELVE**

16 **(Penal Code section 67)**

17 For a further and separate cause of action, being a different offense from, but  
18 connected in its commission with, the charges set forth above, on or about July 18, 2013, in the  
19 County of Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery,  
20 in violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to  
21 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
22 Undercover Officer, give and offer to give a bribe.

23  
24 **COUNT THIRTEEN**

25 **(Penal Code section 67)**

26 For a further and separate cause of action, being a different offense from, but connected in  
27 its commission with, the charges set forth above, on or about September 19, 2013, in the County  
28 of Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery, in

1 violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to  
2 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
3 Undercover Officer, give and offer to give a bribe.

4  
5 **COUNT FOURTEEN**

6 **(Penal Code section 67)**

7 For a further and separate cause of action, being a different offense from, but connected in  
8 its commission with, the charges set forth above, on or about October 18, 2013, in the County of  
9 Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery, in  
10 violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to  
11 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
12 Undercover Officer, give and offer to give a bribe.

13  
14 **COUNT FIFTEEN**

15 **(Penal Code section 67)**

16 For a further and separate cause of action, being a different offense from, but connected in  
17 its commission with, the charges set forth above, on or about December 13, 2013, in the County  
18 of Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery, in  
19 violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to  
20 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
21 Undercover Officer, give and offer to give a bribe.

22  
23 **COUNT SIXTEEN**

24 **(Penal Code section 67)**

25 For a further and separate cause of action, being a different offense from, but connected in  
26 its commission with, the charges set forth above, on or about January 24, 2014, in the County of  
27 Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery, in  
28 violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to

1 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
2 Undercover Officer, give and offer to give a bribe.

3  
4 **COUNT SEVENTEEN**

5 **(Penal Code section 67)**

6 For a further and separate cause of action, being a different offense from, but connected in  
7 its commission with, the charges set forth above, on or about February 14, 2014, in the County of  
8 Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery, in  
9 violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to  
10 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
11 Undercover Officer, give and offer to give a bribe.

12  
13 **COUNT EIGHTEEN**

14 **(Penal Code section 67)**

15 For a further and separate cause of action, being a different offense from, but connected in  
16 its commission with, the charges set forth above, on or about March 20, 2014, in the County of  
17 Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery, in  
18 violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to  
19 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
20 Undercover Officer, give and offer to give a bribe.

21  
22 **COUNT NINETEEN**

23 **(Penal Code section 67)**

24 For a further and separate cause of action, being a different offense from, but connected in  
25 its commission with, the charges set forth above, on or about April 14, 2014, in the County of  
26 Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery, in  
27 violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to  
28

1 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
2 Undercover Officer, give and offer to give a bribe.

3  
4 **COUNT TWENTY**

5 **(Penal Code section 67)**

6 For a further and separate cause of action, being a different offense from, but connected in  
7 its commission with, the charges set forth above, on or about May 13, 2014, in the County of  
8 Alameda, DEFENDANTS LEE and LOI did unlawfully commit the crime of bribery, in  
9 violation of Penal Code section 67, in that said Defendants, did unlawfully and with intent to  
10 influence an Undercover Officer in respect to an act, decision, vote, opinion or proceeding of said  
11 Undercover Officer, give and offer to give a bribe.

12  
13 **COUNT TWENTY ONE**

14 **(Unemployment Insurance Code section 2117.5)**

15 For a further and separate cause of action, being a different offense from, but connected in  
16 its commission with, the charges set forth above, between January 1, 2014 and March 31, 2014, in  
17 the County of Alameda, DEFENDANTS LEE and LIU did unlawfully commit the crime of  
18 acting to evade unemployment insurance tax, in violation of Unemployment Insurance Code  
19 section 2117.5, in that said Defendants willfully failed to file a return and report and to supply  
20 information, with the intent to evade any tax imposed by such code.

21  
22 **COUNT TWENTY TWO**

23 **(Unemployment Insurance Code section 2117.5)**

24 For a further and separate cause of action, being a different offense from, but connected in  
25 its commission with, the charges set forth above, between October 1, 2013 and December 31,  
26 2013 in the County of Alameda, DEFENDANTS LEE and LIU did unlawfully commit the crime  
27 of acting to evade unemployment insurance tax, in violation of Unemployment Insurance Code  
28

1 section 2117.5, in that said Defendants willfully failed to file a return and report and to supply  
2 information, with the intent to evade any tax imposed by such code.

3  
4 **COUNT TWENTY THREE**

5 **(Unemployment Insurance Code section 2117.5)**

6 For a further and separate cause of action, being a different offense from, but connected in  
7 its commission with, the charges set forth above, between July 1, 2013 and September 30, 2013 in  
8 the County of Alameda, DEFENDANTS LEE and LIU did unlawfully commit the crime of  
9 acting to evade unemployment insurance tax, in violation of Unemployment Insurance Code  
10 section 2117.5, in that said Defendants willfully failed to file a return and report and to supply  
11 information, with the intent to evade any tax imposed by such code.

12  
13 **COUNT TWENTY FOUR**

14 **(Unemployment Insurance Code section 2117.5)**

15 For a further and separate cause of action, being a different offense from, but connected in  
16 its commission with, the charges set forth above, between April 1, 2013 and June 30, 2013 in the  
17 County of Alameda, DEFENDANTS LEE and LIU did unlawfully commit the crime of acting to  
18 evade unemployment insurance tax, in violation of Unemployment Insurance Code section  
19 2117.5, in that said Defendants willfully failed to file a return and report and to supply  
20 information, with the intent to evade any tax imposed by such code.

21  
22 **COUNT TWENTY FIVE**

23 **(Unemployment Insurance Code section 2117.5)**

24 For a further and separate cause of action, being a different offense from, but connected in  
25 its commission with, the charges set forth above, between January 1, 2013 and March 31, 2013 in  
26 the County of Alameda, DEFENDANTS LEE and LIU did unlawfully commit the crime of  
27 acting to evade unemployment insurance tax, in violation of Unemployment Insurance Code  
28

1 section 2117.5, in that said Defendants willfully failed to file a return and report and to supply  
2 information, with the intent to evade any tax imposed by such code.

3  
4 **COUNT TWENTY SIX**

5 **(Unemployment Insurance Code section 2118.5)**

6 For a further and separate cause of action, being a different offense from, but connected in  
7 its commission with, the charges set forth above, between January 1, 2014 and March 31 2014, in  
8 the County of Alameda, DEFENDANTS LEE and LIU did unlawfully commit the crime of  
9 failure to collect or pay Unemployment Insurance tax, in violation of Unemployment Insurance  
10 Code section 2118.5, in that said Defendants although required by the Unemployment Insurance  
11 Code to collect, account for, and pay over any tax or amount required to be withheld, did then and  
12 there willfully fail to collect and truthfully account for and pay over such tax or amount.

13  
14 **COUNT TWENTY SEVEN**

15 **(Unemployment Insurance Code section 2118.5)**

16 For a further and separate cause of action, being a different offense from, but connected in  
17 its commission with, the charges set forth above, between October 1, 2013 and December 31,  
18 2013, in the County of Alameda, DEFENDANTS LEE and LIU did unlawfully commit the crime  
19 of failure to collect or pay Unemployment Insurance tax, in violation of Unemployment Insurance  
20 Code section 2118.5, in that said Defendants although required by the Unemployment Insurance  
21 Code to collect, account for, and pay over any tax or amount required to be withheld, did then and  
22 there willfully fail to collect and truthfully account for and pay over such tax or amount.

23  
24 **COUNT TWENTY EIGHT**

25 **(Unemployment Insurance Code section 2118.5)**

26 For a further and separate cause of action, being a different offense from, but connected in  
27 its commission with, the charges set forth above, between July 1, 2013 and September 30, 2013,  
28 in the County of Alameda, DEFENDANTS LEE and LIU did unlawfully commit the crime of

1 failure to collect or pay Unemployment Insurance tax, in violation of Unemployment Insurance  
2 Code section 2118.5, in that said Defendants although required by the Unemployment Insurance  
3 Code to collect, account for, and pay over any tax or amount required to be withheld, did then and  
4 there willfully fail to collect and truthfully account for and pay over such tax or amount.

5  
6 **COUNT TWENTY NINE**

7 **(Unemployment Insurance Code section 2118.5)**

8 For a further and separate cause of action, being a different offense from, but connected in  
9 its commission with, the charges set forth above, between April 1, 2013 and June 30, 2013, in the  
10 County of Alameda, DEFENDANTS LEE and LIU did unlawfully commit the crime of failure to  
11 collect or pay Unemployment Insurance tax, in violation of Unemployment Insurance Code  
12 section 2118.5, in that said Defendants although required by the Unemployment Insurance Code  
13 to collect, account for, and pay over any tax or amount required to be withheld, did then and there  
14 willfully fail to collect and truthfully account for and pay over such tax or amount.

15  
16 **COUNT THIRTY**

17 **(Unemployment Insurance Code section 2118.5)**

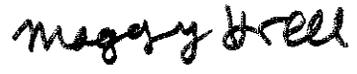
18 For a further and separate cause of action, being a different offense from, but connected in  
19 its commission with, the charges set forth above, between January 1, 2013 and March 31, 2013, in  
20 the County of Alameda, DEFENDANTS LEE and LIU did unlawfully commit the crime of  
21 failure to collect or pay Unemployment Insurance tax, in violation of Unemployment Insurance  
22 Code section 2118.5, in that said Defendants although required by the Unemployment Insurance  
23 Code to collect, account for, and pay over any tax or amount required to be withheld, did then and  
24 there willfully fail to collect and truthfully account for and pay over such tax or amount.

1 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that defense  
2 counsel provide the People with discovery as required by Penal Code section 1054.3.

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Dated: December 9, 2014

Respectfully Submitted,  
KAMALA D. HARRIS  
Attorney General of California



MAGGY KRELL  
Deputy Attorney General  
*Attorneys for People*