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3 State Bar Number
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10 Attorneys for Plaintiff

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN JOAQUIN
12 STOCKTON BRANCH

13 THE PEOPLE OF THE STATE OF CALIFORNIA,
14 Plaintiff,

15 vs.

16 SHAKIR KHAN, CR-2021-0010460
17 ZAKIR KHAN, CR-2021-0010461,

18 Defendant(s).

19 DA Case: 0887352/CR-2021-
20 4240576
21 0887355

22 Complaint No: 4240576

23 INFORMATION

24 The said defendant(s) is/are accused by the District Attorney of the County of SAN JOAQUIN
25 of the State of California, by this Information, of the following crime(s):

26 **COUNT 1: Code Section PC 337a(a)(5) PERMITTING UNLAWFUL USE OF ROOM**
27 **OR ENCLOSURE**

28 On or about February 14, 2018, through and including October 28, 2020, in the County of San
Joaquin, California, SHAKIR KHAN AND ZAKIR KHAN did commit the crime of
PERMITTING PLACE TO BE USED FOR BETTING ACTIVITIES, in violation of
California Penal Code Section 337a(a)5, a FELONY, who at the time and place last aforesaid,
did willfully, unlawfully and knowingly, being the owner, lessee or occupant of any place,

1 permit that space to be used or occupied for bookmaking, or pool selling, or
2 recording/registering of bets, or holding/receiving/forwarding of bets, to wit: AMERICAN
3 SMOKERS CLUB AT 2620 E. WATERLOO RD. #2, STOCKTON, CA.

4
5 **LEADERSHIP: Rule of Court 4.421(a)(4) and Penal Code section 1170(b)**

6 It is further alleged that said defendant, SHAKIR KHAN, induced others to participate in the
7 commission of the crime and/or occupied a position of leadership or dominance over other
8 participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code section
9 1170(b).

10
11 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

12 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
13 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
14 4.421(a)(8) and Penal Code section 1170(b).

15
16 **LEADERSHIP: Rule of Court 4.421(a)(4) and Penal Code section 1170(b)**

17 It is further alleged that said defendant, ZAKIR KHAN, induced others to participate in the
18 commission of the crime and/or occupied a position of leadership or dominance over other
19 participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code section
20 1170(b).

21
22 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

23 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
24 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
25 4.421(a)(8) and Penal Code section 1170(b).

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1 For a further and separate cause of complaint, being a different offense from but connected in
2 its commission with the charge(s) above, complainant further complains and says:

3
4 **COUNT 2: Code Section PC 337a(a)(5) PERMITTING UNLAWFUL USE OF ROOM**
5 **OR ENCLOSURE**

6 On or about October 7, 2019, through and including October 28, 2020, in the County of San
7 Joaquin, California, SHAKIR KHAN AND ZAKIR KHAN did commit the crime of
8 PERMITTING PLACE TO BE USED FOR BETTING ACTIVITIES, in violation of
9 California Penal Code Section 337a(a)5, a FELONY, who at the time and place last aforesaid,
10 did willfully, unlawfully and knowingly, being the owner, lessee or occupant of any place,
11 permit that space to be used or occupied for bookmaking, or pool selling, or
12 recording/registering of bets, or holding/receiving/forwarding of bets, to wit: ONE STOP
13 SMOKE SHOP AT 2525 E. FREMONT ST., STOCKTON, CA.

14
15 **LEADERSHIP: Rule of Court 4.421(a)(4) and Penal Code section 1170(b)**

16 It is further alleged that said defendant, SHAKIR KHAN, induced others to participate in the
17 commission of the crime and/or occupied a position of leadership or dominance over other
18 participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code section
19 1170(b).

20
21 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

22 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
23 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
24 4.421(a)(8) and Penal Code section 1170(b).

25
26 **LEADERSHIP: Rule of Court 4.421(a)(4) and Penal Code section 1170(b)**

27 It is further alleged that said defendant, ZAKIR KHAN, induced others to participate in the
28

1 commission of the crime and/or occupied a position of leadership or dominance over other
2 participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code section
3 1170(b).

4
5 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

6 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
7 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
8 4.421(a)(8) and Penal Code section 1170(b).

9
10 For a further and separate cause of complaint, being a different offense from but connected in
11 its commission with the charge(s) above, complainant further complains and says:

12
13 **COUNT 3: Code Section PC 337a(a)(3) HOLD GAMBLING STAKES**

14 On or about February 14, 2018, through and including October 28, 2020, in the County of San
15 Joaquin, California, SHAKIR KHAN AND ZAKIR KHAN did did commit the crime of
16 HOLD GAMBLING STAKES, in violation of California Penal Code Section 337a(a)(3), a
17 FELONY, who at the time and place last aforesaid, did willfully, unlawfully and knowingly,
18 whether for gain, hire, reward, or gratuitously, or otherwise, receive, hold, or forward, or
19 purport or pretend to receive, hold, or forward, in any manner whatsoever, any money, thing or
20 consideration of value, or the equivalent or memorandum thereof, staked, pledged, bet or
21 wagered, or to be staked, pledged, bet or wagered, or offered for the purpose of being staked,
22 pledged, bet or wagered, upon the result, or purported result, of any trial, or purported trial, or
23 contest, or purported contest, of skill, speed or power of endurance of person or animal, or
24 between persons, animals, or mechanical apparatus, or upon the result, or purported result, of
25 any lot, chance, casualty, unknown or contingent event whatsoever to wit: AMERICAN
26 SMOKERS CLUB AT 2620 E. WATERLOO RD. #2, STOCKTON, CA.

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1 **LEADERSHIP: Rule of Court 4.421(a)(4) and Penal Code section 1170(b)**

2 It is further alleged that said defendant, SHAKIR KHAN, induced others to participate in the
3 commission of the crime and/or occupied a position of leadership or dominance over other
4 participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code section
5 1170(b).

6
7 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

8 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
9 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
10 4.421(a)(8) and Penal Code section 1170(b).

11
12 **LEADERSHIP: Rule of Court 4.421(a)(4) and Penal Code section 1170(b)**

13 It is further alleged that said defendant, ZAKIR KHAN, induced others to participate in the
14 commission of the crime and/or occupied a position of leadership or dominance over other
15 participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code section
16 1170(b).

17
18 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

19 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
20 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
21 4.421(a)(8) and Penal Code section 1170(b).

22
23 For a further and separate cause of complaint, being a different offense from but connected in
24 its commission with the charge(s) above, complainant further complains and says:

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1 **COUNT 4: Code Section PC 337a(a)(3) HOLD GAMBLING STAKES**

2 On or about October 7, 2019, through and including October 28, 2020, in the County of San
3 Joaquin, California, SHAKIR KHAN AND ZAKIR KHAN did did commit the crime of
4 HOLD GAMBLING STAKES, in violation of California Penal Code Section 337a(a)(3), a
5 FELONY, who at the time and place last aforesaid, did willfully, unlawfully and knowingly,
6 whether for gain, hire, reward, or gratuitously, or otherwise, receive, hold, or forward, or
7 purport or pretend to receive, hold, or forward, in any manner whatsoever, any money, thing or
8 consideration of value, or the equivalent or memorandum thereof, staked, pledged, bet or
9 wagered, or to be staked, pledged, bet or wagered, or offered for the purpose of being staked,
10 pledged, bet or wagered, upon the result, or purported result, of any trial, or purported trial, or
11 contest, or purported contest, of skill, speed or power of endurance of person or animal, or
12 between persons, animals, or mechanical apparatus, or upon the result, or purported result, of
13 any lot, chance, casualty, unknown or contingent event whatsoever to wit: ONE STOP
14 SMOKE SHOP AT 2525 E. FREMONT ST., STOCKTON, CA..

15
16 **LEADERSHIP: Rule of Court 4.421(a)(4) and Penal Code section 1170(b)**

17 It is further alleged that said defendant, SHAKIR KHAN, induced others to participate in the
18 commission of the crime and/or occupied a position of leadership or dominance over other
19 participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code section
20 1170(b).

21
22 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

23 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
24 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
25 4.421(a)(8) and Penal Code section 1170(b).

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1 **LEADERSHIP: Rule of Court 4.421(a)(4) and Penal Code section 1170(b)**

2 It is further alleged that said defendant, ZAKIR KHAN, induced others to participate in the
3 commission of the crime and/or occupied a position of leadership or dominance over other
4 participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code section
5 1170(b).

6
7 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

8 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
9 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
10 4.421(a)(8) and Penal Code section 1170(b).

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 5: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
16 **BENEFITS**

17 On or about August 2, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
18 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
19 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
20 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
21 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
22 or false social security number, or other false identification to obtain, increase, reduce, or
23 defeat any benefit or payment to said defendant(s) or any other person under the statute
24 administered by the Employment Development Department, to wit: SHAKIR KHAN.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 6: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
2 **BENEFITS**

3 On or about July 27, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
4 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
5 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
6 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
7 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
8 or false social security number, or other false identification to obtain, increase, reduce, or
9 defeat any benefit or payment to said defendant(s) or any other person under the statute
10 administered by the Employment Development Department, to wit: BIBI AMNA.

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 7: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
16 **BENEFITS**

17 On or about July 28, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
18 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
19 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
20 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
21 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
22 or false social security number, or other false identification to obtain, increase, reduce, or
23 defeat any benefit or payment to said defendant(s) or any other person under the statute
24 administered by the Employment Development Department, to wit: TAZEEM AKHTAR.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 8: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
2 **BENEFITS**

3 On or about July 28, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
4 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
5 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
6 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
7 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
8 or false social security number, or other false identification to obtain, increase, reduce, or
9 defeat any benefit or payment to said defendant(s) or any other person under the statute
10 administered by the Employment Development Department, to wit: AFZAL KHAN.

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 9: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
16 **BENEFITS**

17 On or about July 28, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
18 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
19 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
20 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
21 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
22 or false social security number, or other false identification to obtain, increase, reduce, or
23 defeat any benefit or payment to said defendant(s) or any other person under the statute
24 administered by the Employment Development Department, to wit: HIKMAT KHAN.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 10: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
2 **BENEFITS**

3 On or about August 1, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
4 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
5 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
6 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
7 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
8 or false social security number, or other false identification to obtain, increase, reduce, or
9 defeat any benefit or payment to said defendant(s) or any other person under the statute
10 administered by the Employment Development Department, to wit: SALMA BEGUM.

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 11: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
16 **BENEFITS**

17 On or about August 2, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
18 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
19 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
20 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
21 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
22 or false social security number, or other false identification to obtain, increase, reduce, or
23 defeat any benefit or payment to said defendant(s) or any other person under the statute
24 administered by the Employment Development Department, to wit: ISHRAT AFZA.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 12: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
2 **BENEFITS**

3 On or about August 2, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
4 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
5 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
6 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
7 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
8 or false social security number, or other false identification to obtain, increase, reduce, or
9 defeat any benefit or payment to said defendant(s) or any other person under the statute
10 administered by the Employment Development Department, to wit: SHAMIN AKHTAR.

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 13: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
16 **BENEFITS**

17 On or about August 2, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
18 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
19 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
20 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
21 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
22 or false social security number, or other false identification to obtain, increase, reduce, or
23 defeat any benefit or payment to said defendant(s) or any other person under the statute
24 administered by the Employment Development Department, to wit: RAHEELA ZAMAN.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 14: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
2 **BENEFITS**

3 On or about August 2, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
4 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
5 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
6 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
7 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
8 or false social security number, or other false identification to obtain, increase, reduce, or
9 defeat any benefit or payment to said defendant(s) or any other person under the statute
10 administered by the Employment Development Department, to wit: TARIQ MEHMOOD.

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 15: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
16 **BENEFITS**

17 On or about August 16, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
18 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
19 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
20 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
21 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
22 or false social security number, or other false identification to obtain, increase, reduce, or
23 defeat any benefit or payment to said defendant(s) or any other person under the statute
24 administered by the Employment Development Department, to wit: BIBI KHATIJA.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 16: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
2 **BENEFITS**

3 On or about August 16, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
4 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
5 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
6 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
7 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
8 or false social security number, or other false identification to obtain, increase, reduce, or
9 defeat any benefit or payment to said defendant(s) or any other person under the statute
10 administered by the Employment Development Department, to wit: SAJID MEHMOOD.

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 17: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
16 **BENEFITS**

17 On or about August 22, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
18 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
19 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
20 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
21 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
22 or false social security number, or other false identification to obtain, increase, reduce, or
23 defeat any benefit or payment to said defendant(s) or any other person under the statute
24 administered by the Employment Development Department, to wit: SABIR JAN.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 18: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
2 **BENEFITS**

3 On or about August 22, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
4 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
5 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
6 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
7 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
8 or false social security number, or other false identification to obtain, increase, reduce, or
9 defeat any benefit or payment to said defendant(s) or any other person under the statute
10 administered by the Employment Development Department, to wit: SHER KHAN.

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 19: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
16 **BENEFITS**

17 On or about August 24, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
18 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
19 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
20 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
21 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
22 or false social security number, or other false identification to obtain, increase, reduce, or
23 defeat any benefit or payment to said defendant(s) or any other person under the statute
24 administered by the Employment Development Department, to wit: HIKMAT KHAN.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 20: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
2 **BENEFITS**

3 On or about August 25, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
4 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
5 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
6 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
7 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
8 or false social security number, or other false identification to obtain, increase, reduce, or
9 defeat any benefit or payment to said defendant(s) or any other person under the statute
10 administered by the Employment Development Department, to wit: MUHAMMAD BASSAM.

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 21: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
16 **BENEFITS**

17 On or about August 27, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
18 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
19 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
20 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
21 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
22 or false social security number, or other false identification to obtain, increase, reduce, or
23 defeat any benefit or payment to said defendant(s) or any other person under the statute
24 administered by the Employment Development Department, to wit: AJAIB SULTAN.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 22: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
2 **BENEFITS**

3 On or about August 27, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
4 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
5 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
6 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
7 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
8 or false social security number, or other false identification to obtain, increase, reduce, or
9 defeat any benefit or payment to said defendant(s) or any other person under the statute
10 administered by the Employment Development Department, to wit: MUHAMMAD UMAR.

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 23: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
16 **BENEFITS**

17 On or about August 29, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
18 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
19 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
20 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
21 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
22 or false social security number, or other false identification to obtain, increase, reduce, or
23 defeat any benefit or payment to said defendant(s) or any other person under the statute
24 administered by the Employment Development Department, to wit: BIBI SHAGUFTA.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 24: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
2 **BENEFITS**

3 On or about August 31, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
4 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
5 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
6 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
7 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
8 or false social security number, or other false identification to obtain, increase, reduce, or
9 defeat any benefit or payment to said defendant(s) or any other person under the statute
10 administered by the Employment Development Department, to wit: SERISH AHMED.

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 25: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
16 **BENEFITS**

17 On or about August 31, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
18 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
19 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
20 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
21 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
22 or false social security number, or other false identification to obtain, increase, reduce, or
23 defeat any benefit or payment to said defendant(s) or any other person under the statute
24 administered by the Employment Development Department, to wit: SIDRA AHMED.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 26: Code Section UI 2101(A)(1) FALSE STATEMENT/ETC REGARDING**
2 **BENEFITS**

3 On or about August 31, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
4 commit the crime of FALSE STATEMENT/ETC REGARDING UNEMPLOYMENT
5 COMPENSATION, in violation of Section 2101(A)(1) of the Unemployment Insurance Code,
6 a FELONY, who at the time and place last aforesaid, did willfully and unlawfully make a false
7 statement or representation, or knowingly fail to disclose a material fact, or to use a false name,
8 or false social security number, or other false identification to obtain, increase, reduce, or
9 defeat any benefit or payment to said defendant(s) or any other person under the statute
10 administered by the Employment Development Department, to wit: TASLEEM BEGUM.

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 27: Code Section PC 487(A) GRAND THEFT: MONEY/LABOR/PROPERTY**

16 On or about July 27, 2020, through and including October 28, 2020, in the County of San
17 Joaquin, California, SHAKIR KHAN did commit the crime of GRAND
18 THEFT:MONEY/LABOR/PROPERTY, in violation of Section 487(a) of the Penal Code, a
19 FELONY, who at the time and place last aforesaid, did willfully and unlawfully take money
20 and personal property of another of a value exceeding nine hundred fifty dollars (\$950.00), to-
21 wit: STATE OF CALIFORNIA, EDD UNEMPLOYMENT INSURANCE BENEFITS.

22
23 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

24 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
25 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
26 4.421(a)(8) and Penal Code section 1170(b).

27 //

28

1 **GREAT VALUE: Rule of Court 4.421(a)(9) and Penal Code section 1170(b)**

2 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime by
3 attempting and/or actual taking and/or damage of great monetary value, as set forth in Rule of
4 Court 4.421(a)(9) and Penal Code section 1170(b).

5
6 **TRUST: Rule of Court 4.421(a)(11) and Penal Code section 1170(b)**

7 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime by taking
8 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)
9 and Penal Code section 1170(b).

10
11 For a further and separate cause of complaint, being a different offense from but connected in
12 its commission with the charge(s) above, complainant further complains and says:

13
14 **COUNT 28: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
15 **(\$25,000)**

16 On or about April 27, 2018, through and including April 30, 2018, in the County of San
17 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
18 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
19 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
20 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
21 (\$25,000.00), to wit: \$191,897.25, through one or more financial institutions knowing that the
22 monetary instrument represented the proceeds of, and was derived directly or indirectly from
23 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
24 PENAL CODE 337a.

25
26 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

27 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
28

1 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
2 4.421(a)(8) and Penal Code section 1170(b).

3
4 For a further and separate cause of complaint, being a different offense from but connected in
5 its commission with the charge(s) above, complainant further complains and says:

6
7 **COUNT 29: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
8 **(\$25,000)**

9 On or about October 30, 2018, through and including November 28, 2018, in the County of San
10 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
11 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
12 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
13 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
14 (\$25,000.00), to wit: \$230,798.00, through one or more financial institutions knowing that the
15 monetary instrument represented the proceeds of, and was derived directly or indirectly from
16 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
17 PENAL CODE 337a.

18
19 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

20 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
21 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
22 4.421(a)(8) and Penal Code section 1170(b).

23
24 For a further and separate cause of complaint, being a different offense from but connected in
25 its commission with the charge(s) above, complainant further complains and says:

26 //

27 //

28

1 **COUNT 30: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
2 **(\$25,000)**

3 On or about December 3, 2018, through and including December 28, 2018, in the County of
4 San Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING
5 OF PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that
6 said defendant did willfully and unlawfully conduct and attempt to conduct a transaction
7 involving a monetary instrument or instruments of a value exceeding twenty-five thousand
8 dollars (\$25,000.00), to wit: \$58,272.00, through one or more financial institutions knowing
9 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
10 from the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
11 PENAL CODE 337a.

12
13 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

14 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
15 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
16 4.421(a)(8) and Penal Code section 1170(b).

17
18 For a further and separate cause of complaint, being a different offense from but connected in
19 its commission with the charge(s) above, complainant further complains and says:

20
21 **COUNT 31: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
22 **(\$25,000)**

23 On or about January 2, 2019, through and including February 1, 2019, in the County of San
24 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
25 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
26 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
27 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
28

1 (\$25,000.00), to wit: \$48,467.00, through one or more financial institutions knowing that the
2 monetary instrument represented the proceeds of, and was derived directly or indirectly from
3 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
4 PENAL CODE 337a.

5
6 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

7 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
8 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
9 4.421(a)(8) and Penal Code section 1170(b).

10
11 For a further and separate cause of complaint, being a different offense from but connected in
12 its commission with the charge(s) above, complainant further complains and says:

13
14 **COUNT 32: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
15 **(\$25,000)**

16 On or about April 1, 2019, through and including May 1, 2019, in the County of San Joaquin,
17 California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
18 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
19 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
20 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
21 (\$25,000.00), to wit: \$550,254.85, through one or more financial institutions knowing that the
22 monetary instrument represented the proceeds of, and was derived directly or indirectly from
23 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
24 PENAL CODE 337a.

25
26 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

27 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
28

1 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
2 4.421(a)(8) and Penal Code section 1170(b).

3
4 For a further and separate cause of complaint, being a different offense from but connected in
5 its commission with the charge(s) above, complainant further complains and says:

6
7 **COUNT 33: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
8 **(\$5,000)**

9 On or about July 29, 2019, in the County of San Joaquin, California, SHAKIR KHAN did
10 commit the crime of MONEY LAUNDERING OF PROCEEDS, in violation of Section
11 186.10(a)(2) of the Penal Code, a FELONY, in that said defendant did willful and unlawfully
12 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of
13 a value exceeding five thousand dollars (\$5,000.00), to wit; \$20,500.00, through one or more
14 financial institutions with the intent to promote, manage, establish, carry on, and facilitate the
15 promotion, management, establishment, and carrying on of criminal activity, to wit: ILLEGAL
16 GAMBLING IN VIOLATION OF PENAL CODE 337a.

17
18 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

19 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
20 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
21 4.421(a)(8) and Penal Code section 1170(b).

22
23 For a further and separate cause of complaint, being a different offense from but connected in
24 its commission with the charge(s) above, complainant further complains and says:

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26 //

27 //

28

1 **COUNT 34: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
2 **(\$25,000)**

3 On or about September 3, 2019, through and including October 3, 2019, in the County of San
4 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
5 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
6 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
7 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
8 (\$25,000.00), to wit: \$38,432.00, through one or more financial institutions knowing that the
9 monetary instrument represented the proceeds of, and was derived directly or indirectly from
10 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
11 PENAL CODE 337a.

12
13 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

14 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
15 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
16 4.421(a)(8) and Penal Code section 1170(b).

17
18 For a further and separate cause of complaint, being a different offense from but connected in
19 its commission with the charge(s) above, complainant further complains and says:

20
21 **COUNT 35: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
22 **(\$25,000)**

23 On or about October 4, 2019, through and including November 1, 2019, in the County of San
24 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
25 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
26 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
27 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
28

1 (\$25,000.00), to wit: \$35,327.00, through one or more financial institutions knowing that the
2 monetary instrument represented the proceeds of, and was derived directly or indirectly from
3 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
4 PENAL CODE 337a.

5
6 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

7 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
8 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
9 4.421(a)(8) and Penal Code section 1170(b).

10
11 For a further and separate cause of complaint, being a different offense from but connected in
12 its commission with the charge(s) above, complainant further complains and says:

13
14 **COUNT 36: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
15 **(\$5,000)**

16 On or about November 4, 2019, in the County of San Joaquin, California, SHAKIR KHAN did
17 commit the crime of MONEY LAUNDERING OF PROCEEDS, in violation of Section
18 186.10(a)(2) of the Penal Code, a FELONY, in that said defendant did willful and unlawfully
19 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of
20 a value exceeding five thousand dollars (\$5,000.00), to wit: \$19,109.00, through one or more
21 financial institutions with the intent to promote, manage, establish, carry on, and facilitate the
22 promotion, management, establishment, and carrying on of criminal activity, to wit: ILLEGAL
23 GAMBLING IN VIOLATION OF PENAL CODE 337a.

24
25 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

26 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
27
28

1 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
2 4.421(a)(8) and Penal Code section 1170(b).

3
4 For a further and separate cause of complaint, being a different offense from but connected in
5 its commission with the charge(s) above, complainant further complains and says:

6
7 **COUNT 37: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
8 **(\$5,000)**

9 On or about November 15, 2019, through and including November 20, 2019, in the County of
10 San Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING
11 OF PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that
12 said defendant did willful and unlawfully conduct and attempt to conduct a transaction
13 involving a monetary instrument or instruments of a value exceeding five thousand dollars
14 (\$5,000.00), to wit: \$12,611.00, through one or more financial institutions with the intent to
15 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
16 and carrying on of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
17 PENAL CODE 337a.

18
19 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

20 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
21 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
22 4.421(a)(8) and Penal Code section 1170(b).

23
24 For a further and separate cause of complaint, being a different offense from but connected in
25 its commission with the charge(s) above, complainant further complains and says:

26 //

27 //

28

1 **COUNT 38: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
2 **(\$25,000)**

3 On or about November 22, 2019, through and including November 26, 2019, in the County of
4 San Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING
5 OF PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that
6 said defendant did willful and unlawfully conduct and attempt to conduct a transaction
7 involving a monetary instrument or instruments of a value exceeding twenty-five dollars
8 (\$25,000.00), to wit: \$29,512.00, through one or more financial institutions with the intent to
9 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
10 and carrying on of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
11 PENAL CODE 337a.

12
13 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

14 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
15 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
16 4.421(a)(8) and Penal Code section 1170(b).

17
18 For a further and separate cause of complaint, being a different offense from but connected in
19 its commission with the charge(s) above, complainant further complains and says:

20
21 **COUNT 39: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
22 **(\$5,000)**

23 On or about December 18, 2019, in the County of San Joaquin, California, SHAKIR KHAN
24 did commit the crime of MONEY LAUNDERING OF PROCEEDS, in violation of Section
25 186.10(a)(2) of the Penal Code, a FELONY, in that said defendant did willful and unlawfully
26 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of
27 a value exceeding five thousand dollars (\$5,000.00), to wit: \$19,100.00, through one or more
28

1 financial institutions with the intent to promote, manage, establish, carry on, and facilitate the
2 promotion, management, establishment, and carrying on of criminal activity, to wit: ILLEGAL
3 GAMBLING IN VIOLATION OF PENAL CODE 337a.

4
5 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

6 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
7 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
8 4.421(a)(8) and Penal Code section 1170(b).

9
10 For a further and separate cause of complaint, being a different offense from but connected in
11 its commission with the charge(s) above, complainant further complains and says:

12
13 **COUNT 40: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
14 **(\$25,000)**

15 On or about December 24, 2019, through and including January 9, 2020, in the County of San
16 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
17 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
18 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
19 monetary instrument or instruments of a value exceeding twenty-five dollars (\$25,000.00), to
20 wit: \$213,221.52, through one or more financial institutions with the intent to promote,
21 manage, establish, carry on, and facilitate the promotion, management, establishment, and
22 carrying on of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL
23 CODE 337a.

24
25 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

26 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
27
28

1 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
2 4.421(a)(8) and Penal Code section 1170(b).

3
4 For a further and separate cause of complaint, being a different offense from but connected in
5 its commission with the charge(s) above, complainant further complains and says:

6
7 **COUNT 41: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
8 **(\$25,000)**

9 On or about January 14, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
10 commit the crime of MONEY LAUNDERING OF PROCEEDS, in violation of Section
11 186.10(a)(2) of the Penal Code, a FELONY, in that said defendant did willful and unlawfully
12 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of
13 a value exceeding twenty-five dollars (\$25,000.00), to wit: \$25,214.00, through one or more
14 financial institutions with the intent to promote, manage, establish, carry on, and facilitate the
15 promotion, management, establishment, and carrying on of criminal activity, to wit: ILLEGAL
16 GAMBLING IN VIOLATION OF PENAL CODE 337a.

17
18 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

19 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
20 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
21 4.421(a)(8) and Penal Code section 1170(b).

22
23 For a further and separate cause of complaint, being a different offense from but connected in
24 its commission with the charge(s) above, complainant further complains and says:

25 //

26 //

27 //

28

1 **COUNT 42: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
2 **(\$25,000)**

3 On or about January 28, 2020, through and including February 5, 2020, in the County of San
4 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
5 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
6 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
7 monetary instrument or instruments of a value exceeding twenty-five dollars (\$25,000.00), to
8 wit: \$28,081.00, through one or more financial institutions knowing that the monetary
9 instrument represented the proceeds of, and was derived directly or indirectly from the
10 proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL
11 CODE 337a.

12
13 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

14 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
15 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
16 4.421(a)(8) and Penal Code section 1170(b).

17
18 For a further and separate cause of complaint, being a different offense from but connected in
19 its commission with the charge(s) above, complainant further complains and says:

20
21 **COUNT 43: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
22 **(\$25,000)**

23 On or about February 18, 2020, in the County of San Joaquin, California, SHAKIR KHAN did
24 commit the crime of MONEY LAUNDERING OF PROCEEDS, in violation of Section
25 186.10(a)(2) of the Penal Code, a FELONY, in that said defendant did willful and unlawfully
26 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of
27 a value exceeding twenty-five dollars (\$25,000.00), to wit: \$29,463.80, through one or more
28

1 financial institutions with the intent to promote, manage, establish, carry on, and facilitate the
2 promotion, management, establishment, and carrying on of criminal activity, to wit: ILLEGAL
3 GAMBLING IN VIOLATION OF PENAL CODE 337a.

4
5 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

6 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
7 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
8 4.421(a)(8) and Penal Code section 1170(b).

9
10 For a further and separate cause of complaint, being a different offense from but connected in
11 its commission with the charge(s) above, complainant further complains and says:

12
13 **COUNT 44: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
14 **(\$5,000)**

15 On or about March 14, 2020, through and including March 16, 2020, in the County of San
16 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
17 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
18 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
19 monetary instrument or instruments of a value exceeding five thousand dollars (\$5,000.00), to
20 wit: \$13,550.00, through one or more financial institutions with the intent to promote, manage,
21 establish, carry on, and facilitate the promotion, management, establishment, and carrying on
22 of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL CODE 337a.

23
24 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

25 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
26 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
27 4.421(a)(8) and Penal Code section 1170(b).

1 For a further and separate cause of complaint, being a different offense from but connected in
2 its commission with the charge(s) above, complainant further complains and says:

3
4 **COUNT 45: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
5 **(\$25,000)**

6 On or about March 31, 2020, through and including April 20, 2020, in the County of San
7 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
8 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
9 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
10 monetary instrument or instruments of a value exceeding twenty-five dollars (\$25,000.00), to
11 wit: \$51,303.80, through one or more financial institutions with the intent to promote, manage,
12 establish, carry on, and facilitate the promotion, management, establishment, and carrying on
13 of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL CODE 337a.

14
15 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

16 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
17 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
18 4.421(a)(8) and Penal Code section 1170(b).

19
20 For a further and separate cause of complaint, being a different offense from but connected in
21 its commission with the charge(s) above, complainant further complains and says:

22
23 **COUNT 46: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
24 **(\$25,000)**

25 On or about April 23, 2020, through and including May 6, 2020, in the County of San Joaquin,
26 California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
27 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
28

1 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
2 monetary instrument or instruments of a value exceeding twenty-five dollars (\$25,000.00), to
3 wit: \$47,003.80, through one or more financial institutions with the intent to promote, manage,
4 establish, carry on, and facilitate the promotion, management, establishment, and carrying on
5 of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL CODE 337a.

6
7 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

8 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
9 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
10 4.421(a)(8) and Penal Code section 1170(b).

11
12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

14
15 **COUNT 47: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
16 **(\$25,000)**

17 On or about May 8, 2020, through and including May 20, 2020, in the County of San Joaquin,
18 California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
19 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
20 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
21 monetary instrument or instruments of a value exceeding twenty-five dollars (\$25,000.00), to
22 wit: \$52,305.00, through one or more financial institutions with the intent to promote, manage,
23 establish, carry on, and facilitate the promotion, management, establishment, and carrying on
24 of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL CODE 337a.

25
26 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

27 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
28

1 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
2 4.421(a)(8) and Penal Code section 1170(b).

3
4 For a further and separate cause of complaint, being a different offense from but connected in
5 its commission with the charge(s) above, complainant further complains and says:

6
7 **COUNT 48: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
8 **(\$25,000)**

9 On or about June 1, 2020, through and including June 29, 2020, in the County of San Joaquin,
10 California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
11 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
12 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
13 monetary instrument or instruments of a value exceeding twenty-five dollars (\$25,000.00), to
14 wit: \$107,057.60, through one or more financial institutions with the intent to promote,
15 manage, establish, carry on, and facilitate the promotion, management, establishment, and
16 carrying on of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL
17 CODE 337a.

18
19 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

20 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
21 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
22 4.421(a)(8) and Penal Code section 1170(b).

23
24 For a further and separate cause of complaint, being a different offense from but connected in
25 its commission with the charge(s) above, complainant further complains and says:

26 //

27 //

28

1 **COUNT 49: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
2 **(\$5,000)**

3 On or about July 1, 2020, through and including July 13, 2020, in the County of San Joaquin,
4 California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
5 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
6 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
7 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
8 (\$25,000.00), to wit: \$25,500.00, through one or more financial institutions knowing that the
9 monetary instrument represented the proceeds of, and was derived directly or indirectly from
10 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
11 PENAL CODE 337a.

12
13 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

14 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
15 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
16 4.421(a)(8) and Penal Code section 1170(b).

17
18 For a further and separate cause of complaint, being a different offense from but connected in
19 its commission with the charge(s) above, complainant further complains and says:

20
21 **COUNT 50: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
22 **(\$25,000)**

23 On or about July 11, 2020, through and including July 13, 2020, in the County of San Joaquin,
24 California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
25 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
26 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
27 monetary instrument or instruments of a value exceeding twenty-five dollars (\$25,000.00), to
28

1 wit: \$30,100.00, through one or more financial institutions with the intent to promote, manage,
2 establish, carry on, and facilitate the promotion, management, establishment, and carrying on
3 of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL CODE 337a.

4
5 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

6 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
7 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
8 4.421(a)(8) and Penal Code section 1170(b).

9
10 For a further and separate cause of complaint, being a different offense from but connected in
11 its commission with the charge(s) above, complainant further complains and says:

12
13 **COUNT 51: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
14 **(\$25,000)**

15 On or about July 14, 2020, through and including July 24, 2020, in the County of San Joaquin,
16 California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
17 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
18 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
19 monetary instrument or instruments of a value exceeding twenty-five dollars (\$25,000.00), to
20 wit: \$48,400.00, through one or more financial institutions with the intent to promote, manage,
21 establish, carry on, and facilitate the promotion, management, establishment, and carrying on
22 of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL CODE 337a.

23
24 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

25 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
26 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
27 4.421(a)(8) and Penal Code section 1170(b).

1 For a further and separate cause of complaint, being a different offense from but connected in
2 its commission with the charge(s) above, complainant further complains and says:

3
4 **COUNT 52: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
5 **(\$25,000)**

6 On or about July 28, 2020, through and including August 24, 2020, in the County of San
7 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
8 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
9 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
10 monetary instrument or instruments of a value exceeding twenty-five dollars (\$25,000.00), to
11 wit: \$66,795.00, through one or more financial institutions with the intent to promote, manage,
12 establish, carry on, and facilitate the promotion, management, establishment, and carrying on
13 of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL CODE 337a.

14
15 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

16 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
17 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
18 4.421(a)(8) and Penal Code section 1170(b).

19
20 For a further and separate cause of complaint, being a different offense from but connected in
21 its commission with the charge(s) above, complainant further complains and says:

22
23 **COUNT 53: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
24 **(\$25,000)**

25 On or about August 27, 2020, through and including September 24, 2020, in the County of San
26 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
27 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
28

1 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
2 monetary instrument or instruments of a value exceeding twenty-five dollars (\$25,000.00), to
3 wit: \$133,380.00, through one or more financial institutions with the intent to promote,
4 manage, establish, carry on, and facilitate the promotion, management, establishment, and
5 carrying on of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL
6 CODE 337a.

7
8 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

9 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
10 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
11 4.421(a)(8) and Penal Code section 1170(b).

12
13 For a further and separate cause of complaint, being a different offense from but connected in
14 its commission with the charge(s) above, complainant further complains and says:

15
16 **COUNT 54: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
17 **(\$25,000)**

18 On or about September 25, 2020, through and including October 20, 2020, in the County of
19 San Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING
20 OF PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that
21 said defendant did willful and unlawfully conduct and attempt to conduct a transaction
22 involving a monetary instrument or instruments of a value exceeding twenty-five dollars
23 (\$25,000.00), to wit: \$73,353.80, through one or more financial institutions with the intent to
24 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
25 and carrying on of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
26 PENAL CODE 337a.

27 //
28

1 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

2 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
3 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
4 4.421(a)(8) and Penal Code section 1170(b).

5
6 For a further and separate cause of complaint, being a different offense from but connected in
7 its commission with the charge(s) above, complainant further complains and says:

8
9 **COUNT 55: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
10 **(\$25,000)**

11 On or about October 21, 2020, through and including October 27, 2020, in the County of San
12 Joaquin, California, SHAKIR KHAN did commit the crime of MONEY LAUNDERING OF
13 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
14 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
15 monetary instrument or instruments of a value exceeding twenty-five dollars (\$25,000.00), to
16 wit: \$27,545.00, through one or more financial institutions with the intent to promote, manage,
17 establish, carry on, and facilitate the promotion, management, establishment, and carrying on
18 of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL CODE 337a.

19
20 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

21 It is further alleged that said defendant, SHAKIR KHAN, committed the above crime in a way
22 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
23 4.421(a)(8) and Penal Code section 1170(b).

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28

1 **Transaction Exceeds \$1,000,000 But Less Than \$2,500,000 PC186.10(C)(1)(C)**

2 It is further alleged that the value of the transactions alleged in Counts 28-55 exceeded one
3 million dollars (\$1,000,000), but was less than two million five hundred thousand dollars
4 (\$2,500,000) within the meaning of Penal Code Section 186.10(c)(1)(C), to-wit: \$2,226,654.42.

5
6 For a further and separate cause of complaint, being a different offense from but connected in
7 its commission with the charge(s) above, complainant further complains and says:

8
9 **COUNT 56: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
10 **(\$5,000)**

11 On or about April 7, 2020, through and including April 13, 2020, in the County of San Joaquin,
12 California, ZAKIR KHAN did commit the crime of MONEY LAUNDERING OF
13 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
14 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
15 a monetary instrument or instruments of a value exceeding five thousand dollars (\$5,000.00), to
16 wit: \$9,644.92, through one or more financial institutions knowing that the monetary
17 instrument represented the proceeds of, and was derived directly or indirectly from the
18 proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL
19 CODE 337a.

20
21 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

22 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
23 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
24 4.421(a)(8) and Penal Code section 1170(b).

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 57: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
2 **(\$25,000)**

3 On or about April 17, 2020, through and including May 12, 2020, in the County of San
4 Joaquin, California, ZAKIR KHAN did commit the crime of MONEY LAUNDERING OF
5 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
6 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
7 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
8 (\$25,000.00), to wit: \$34,425.92, through one or more financial institutions knowing that the
9 monetary instrument represented the proceeds of, and was derived directly or indirectly from
10 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
11 PENAL CODE 337a.

12
13 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

14 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
15 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
16 4.421(a)(8) and Penal Code section 1170(b).

17
18 For a further and separate cause of complaint, being a different offense from but connected in
19 its commission with the charge(s) above, complainant further complains and says:

20
21 **COUNT 58: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
22 **(\$25,000)**

23 On or about May 14, 2020, through and including June 11, 2020, in the County of San Joaquin,
24 California, ZAKIR KHAN did commit the crime of MONEY LAUNDERING OF
25 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
26 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
27 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
28

1 (\$25,000.00), to wit: \$66,254.13, through one or more financial institutions knowing that the
2 monetary instrument represented the proceeds of, and was derived directly or indirectly from
3 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
4 PENAL CODE 337a.

5
6 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

7 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
8 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
9 4.421(a)(8) and Penal Code section 1170(b).

10
11 For a further and separate cause of complaint, being a different offense from but connected in
12 its commission with the charge(s) above, complainant further complains and says:

13
14 **COUNT 59: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
15 **(\$5,000)**

16 On or about June 19, 2020, through and including June 24, 2020, in the County of San Joaquin,
17 California, ZAKIR KHAN did commit the crime of MONEY LAUNDERING OF
18 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
19 defendant did willful and unlawfully conduct and attempt to conduct a transaction involving a
20 monetary instrument or instruments of a value exceeding five thousand dollars (\$5000.00), to
21 wit: \$5,685.00, through one or more financial institutions with the intent to promote, manage,
22 establish, carry on, and facilitate the promotion, management, establishment, and carrying on
23 of criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF PENAL CODE 337a.

24
25 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

26 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
27
28

1 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
2 4.421(a)(8) and Penal Code section 1170(b).

3
4 For a further and separate cause of complaint, being a different offense from but connected in
5 its commission with the charge(s) above, complainant further complains and says:

6
7 **COUNT 60: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
8 **(\$25,000)**

9 On or about June 26, 2020, through and including July 23, 2020, in the County of San Joaquin,
10 California, ZAKIR KHAN did commit the crime of MONEY LAUNDERING OF
11 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
12 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
13 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
14 (\$25,000.00), to wit: \$50,810.13, through one or more financial institutions knowing that the
15 monetary instrument represented the proceeds of, and was derived directly or indirectly from
16 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
17 PENAL CODE 337a.

18
19 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

20 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
21 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
22 4.421(a)(8) and Penal Code section 1170(b).

23
24 For a further and separate cause of complaint, being a different offense from but connected in
25 its commission with the charge(s) above, complainant further complains and says:

26 //

27 //

28

1 **COUNT 61: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
2 **(\$25,000)**

3 On or about July 28, 2020, through and including August 21, 2020, in the County of San
4 Joaquin, California, ZAKIR KHAN did commit the crime of MONEY LAUNDERING OF
5 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
6 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
7 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
8 (\$25,000.00), to wit: \$243,650.01, through one or more financial institutions knowing that the
9 monetary instrument represented the proceeds of, and was derived directly or indirectly from
10 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
11 PENAL CODE 337a.

12
13 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

14 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
15 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
16 4.421(a)(8) and Penal Code section 1170(b).

17
18 For a further and separate cause of complaint, being a different offense from but connected in
19 its commission with the charge(s) above, complainant further complains and says:

20
21 **COUNT 62: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
22 **(\$25,000)**

23 On or about August 28, 2020, through and including September 24, 2020, in the County of San
24 Joaquin, California, ZAKIR KHAN did commit the crime of MONEY LAUNDERING OF
25 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
26 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
27 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
28

1 (\$25,000.00), to wit: \$122,828.03, through one or more financial institutions knowing that the
2 monetary instrument represented the proceeds of, and was derived directly or indirectly from
3 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
4 PENAL CODE 337a.

5
6 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

7 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
8 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
9 4.421(a)(8) and Penal Code section 1170(b).

10
11 For a further and separate cause of complaint, being a different offense from but connected in
12 its commission with the charge(s) above, complainant further complains and says:

13
14 **COUNT 63: Code Section PC 186.10(a)(2) MONEY LAUNDERING OF PROCEEDS**
15 **(\$25,000)**

16 On or about October 2, 2020, through and including October 27, 2020, in the County of San
17 Joaquin, California, ZAKIR KHAN did commit the crime of MONEY LAUNDERING OF
18 PROCEEDS, in violation of Section 186.10(a)(2) of the Penal Code, a FELONY, in that said
19 defendant did willfully and unlawfully conduct and attempt to conduct a transaction involving
20 a monetary instrument or instruments of a value exceeding twenty-five thousand dollars
21 (\$25,000.00), to wit: \$66,568.00, through one or more financial institutions knowing that the
22 monetary instrument represented the proceeds of, and was derived directly or indirectly from
23 the proceeds of, criminal activity, to wit: ILLEGAL GAMBLING IN VIOLATION OF
24 PENAL CODE 337a.

25
26 **PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b)**

27 It is further alleged that said defendant, ZAKIR KHAN, committed the above crime in a way
28

1 that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court
2 4.421(a)(8) and Penal Code section 1170(b).

3
4 **Transaction Exceeds \$150,000 But Less Than \$1,000,000 PC186.10(C)(1)(B)**

5 It is further alleged that the value of the transactions alleged in Counts 56-63 exceeded one
6 hundred fifty thousand dollars (\$150,000), but was less than one million dollars (\$1,000,000)
7 within the meaning of Penal Code Section 186.10(c)(1)(B), to-wit: \$599,866.14.

8
9 For a further and separate cause of complaint, being a different offense from but connected in
10 its commission with the charge(s) above, complainant further complains and says:

11
12 **COUNT 64: Code Section RT 19706 FAILURE TO FILE TAX RETURN WITH**
13 **INTENT TO EVADE**

14 On or about 2019, in the County of San Joaquin, California, SHAKIR KHAN did commit the
15 crime of FILING A FALSE OR FRAUDULENT TAX RETURN, in violation of Section
16 19706 of the Revenue and Taxation Code, a FELONY, who at the time and place last aforesaid
17 did willfully and unlawfully fail to file a return or supply information with intent to evade; or
18 made, rendered, signed, or verified a false or fraudulent return, or statement; or supplied any
19 false or fraudulent information, for the tax year of 2018.

20
21 For a further and separate cause of complaint, being a different offense from but connected in
22 its commission with the charge(s) above, complainant further complains and says:

23
24 **COUNT 65: Code Section RT 19706 FAILURE TO FILE TAX RETURN WITH**
25 **INTENT TO EVADE**

26 On or about 2020, in the County of San Joaquin, California, SHAKIR KHAN did commit the
27 crime of FILING A FALSE OR FRAUDULENT TAX RETURN, in violation of Section
28

1 19706 of the Revenue and Taxation Code, a FELONY, who at the time and place last aforesaid
2 did willfully and unlawfully fail to file a return or supply information with intent to evade; or
3 made, rendered, signed, or verified a false or fraudulent return, or statement; or supplied any
4 false or fraudulent information, for the tax year of 2019.

5
6 For a further and separate cause of complaint, being a different offense from but connected in
7 its commission with the charge(s) above, complainant further complains and says:

8
9 **COUNT 66: Code Section PC 330A POSSESS/CONTROL SLOT MACHINE/ETC**

10 On or about July 23, 2019, in the County of San Joaquin, California, SHAKIR KHAN did
11 commit the crime of POSSESSION OF SLOT OR CARD MACHINE, in violation of Section
12 330a of the Penal Code, a MISDEMEANOR, who at the time and place last aforesaid, did
13 willfully and unlawfully possess or control a slot or card machine. 2620 E WATERLOO #2,
14 STOCKTON, CA.

15
16 For a further and separate cause of complaint, being a different offense from but connected in
17 its commission with the charge(s) above, complainant further complains and says:

18
19 **COUNT 67: Code Section PC 330A POSSESS/CONTROL SLOT MACHINE/ETC**

20 On or about July 31, 2019, in the County of San Joaquin, California, SHAKIR KHAN did
21 commit the crime of POSSESSION OF SLOT OR CARD MACHINE, in violation of Section
22 330a of the Penal Code, a MISDEMEANOR, who at the time and place last aforesaid, did
23 willfully and unlawfully possess or control a slot or card machine. 2620 E WATERLOO #2,
24 STOCKTON, CA.

25
26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

28

1 **COUNT 68: Code Section PC 330A POSSESS/CONTROL SLOT MACHINE/ETC**

2 On or about December 12, 2019, in the County of San Joaquin, California, SHAKIR KHAN
3 AND ZAKIR KHAN did commit the crime of POSSESSION OF SLOT OR CARD
4 MACHINE, in violation of Section 330a of the Penal Code, a MISDEMEANOR, who at the
5 time and place last aforesaid, did willfully and unlawfully possess or control a slot or card
6 machine. 2525 E FREMONT ST., STOCKTON, CA.

7
8 For a further and separate cause of complaint, being a different offense from but connected in
9 its commission with the charge(s) above, complainant further complains and says:

10
11 **COUNT 69: Code Section PC 330B(A) POSSESSION AND KEEPING OF SLOT**
12 **MACHINES OR DEVICES**

13 On or about September 7, 2020, in the County of San Joaquin, California, SHAKIR KHAN
14 AND ZAKIR KHAN did commit the crime of POSSESSION AND KEEPING OF SLOT
15 MACHINES OR DEVICES, in violation of Section 330b(a) of the Penal Code, a
16 MISDEMEANOR, who at the time and place last aforesaid, did willfully and unlawfully repair,
17 own, store, possess, sell, rent, lease, let on shares, lend or give away, transport, or expose for
18 sale or lease, and to offer to repair, sell, rent, lease, let on shares, lend and give away, and to
19 permit the operation of, and for any person to permit to be placed, maintained and kept in any
20 place, room, space or building owned, leased, or occupied by him/her or under his/her
21 management and control, any slot machine and device as hereinafter defined, and to make and
22 to permit to be made with any person any agreement with reference to any slot machine and
23 device, at 2620 E WATERLOO #2, STOCKTON, CA.

24
25 For a further and separate cause of complaint, being a different offense from but connected in
26 its commission with the charge(s) above, complainant further complains and says:

27
28

1 **COUNT 70: Code Section PC 330B(A) POSSESSION AND KEEPING OF SLOT**
2 **MACHINES OR DEVICES**

3 On or about October 28, 2020, in the County of San Joaquin, California, SHAKIR KHAN
4 AND ZAKIR KHAN did commit the crime of POSSESSION AND KEEPING OF SLOT
5 MACHINES OR DEVICES, in violation of Section 330b(a) of the Penal Code, a
6 MISDEMEANOR, who at the time and place last aforesaid, did willfully and unlawfully repair,
7 own, store, possess, sell, rent, lease, let on shares, lend or give away, transport, or expose for
8 sale or lease, and to offer to repair, sell, rent, lease, let on shares, lend and give away, and to
9 permit the operation of, and for any person to permit to be placed, maintained and kept in any
10 place, room, space or building owned, leased, or occupied by him/her or under his/her
11 management and control, any slot machine and device as hereinafter defined, and to make and
12 to permit to be made with any person any agreement with reference to any slot machine and
13 device, at 2525 E FREMONT ST., STOCKTON, CA.

14
15 For a further and separate cause of complaint, being a different offense from but connected in
16 its commission with the charge(s) above, complainant further complains and says:

17
18 **COUNT 71: Code Section PC 330B(A) POSSESSION AND KEEPING OF SLOT**
19 **MACHINES OR DEVICES**

20 On or about October 16, 2020, in the County of San Joaquin, California, SHAKIR KHAN
21 AND ZAKIR KHAN did commit the crime of POSSESSION AND KEEPING OF SLOT
22 MACHINES OR DEVICES, in violation of Section 330b(a) of the Penal Code, a
23 MISDEMEANOR, who at the time and place last aforesaid, did willfully and unlawfully repair,
24 own, store, possess, sell, rent, lease, let on shares, lend or give away, transport, or expose for
25 sale or lease, and to offer to repair, sell, rent, lease, let on shares, lend and give away, and to
26 permit the operation of, and for any person to permit to be placed, maintained and kept in any
27 place, room, space or building owned, leased, or occupied by them or under their management
28

1 and control, any slot machine and device as hereinafter defined, and to make and to permit to
2 be made with any person any agreement with reference to any slot machine and device, to wit:
3 2620 E. WATERLOO RD. #2, STOCKTON, CA.

4
5 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that the
6 defendant and his attorney disclose to the People all information and materials described in
7 Penal Code Section 1054.3.

8
9 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that the
10 defendant and his attorney disclose to the People all information and materials described in
11 Penal Code Section 1054.3.

12
13 Dated: February 17, 2023

Respectfully submitted,

14 RONALD J. FREITAS,
15 DISTRICT ATTORNEY

16 By:

17 

18 TODD TURNER
19 Deputy District Attorney

20 TT/mm

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