

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA,
HAYWARD HALL OF JUSTICE

PEOPLE OF THE STATE OF CALIFORNIA

NO.
COMPLAINT

v.

JI LI ZHENG

PFN: DRO636 CEN: 3348371

Defendant(s).

The Undersigned, being sworn says, on information and belief, that JI LI ZHENG did, in the County of Alameda, State of California, between October 1, 2010 and December 31, 2010, commit a Felony, to wit: ACTING TO EVADE UI TAX, a violation of section 2117.5 of the UNEMPLOYMENT INSURANCE CODE of California, in that said defendant(s) did then and there, within the time required by the Unemployment Insurance Code of California, willfully fail to file a return and report and to supply information, with the intent to evade any tax imposed by such code, and willfully and with like intent, did make, render, sign, and verify a false or fraudulent return, report, and statement and did supply false and fraudulent information.

SECOND COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between October 1, 2010 and December 31, 2010, commit a Felony, to wit: FAILURE TO COLLECT OR PAY OVER UI TAX, a violation of section 2118.5 of the UNEMPLOYMENT INSURANCE CODE of California, in that said defendant(s) although required by the Unemployment Insurance Code to collect, account for, and pay over any tax or amount required to be withheld, did then and there willfully fail to collect and truthfully account for and pay over such tax or amount.

THIRD COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between January 1, 2011 and December 31, 2011, commit a Felony, to wit: ACTING TO EVADE UI TAX, a violation of section 2117.5 of the UNEMPLOYMENT INSURANCE CODE of California, in that said defendant(s) did then and there, within the time required by the Unemployment Insurance Code of California, willfully fail to file a return and report and to supply information, with the intent to evade any tax imposed by such code, and willfully and with like intent, did make, render, sign, and verify a false or fraudulent return, report, and statement and did supply false and fraudulent information.

FOURTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between January 1, 2011 and December 31, 2011, commit a Felony, to wit: FAILURE TO COLLECT OR PAY OVER UI TAX, a violation of section 2118.5 of the UNEMPLOYMENT INSURANCE CODE of California, in that said defendant(s) although required by the Unemployment Insurance Code to collect, account for, and pay over any tax or amount required to be withheld, did then and there willfully fail to collect and truthfully account for and pay over such tax or amount.

FIFTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between January 1, 2012 and December 31, 2012, commit a Felony, to wit: ACTING TO EVADE UI TAX, a violation of section 2117.5 of the UNEMPLOYMENT INSURANCE CODE of California, in that said defendant(s) did then and there, within the time required by the Unemployment Insurance Code of California, willfully fail to file a return and report and to supply information, with the intent to evade any tax imposed by such code, and willfully and with like intent, did make, render, sign, and verify a false or fraudulent return, report, and statement and did supply false and fraudulent information.

SIXTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between January 1, 2012 and December 31, 2012, commit a Felony, to wit: FAILURE TO COLLECT OR PAY OVER UI TAX, a violation of section 2118.5 of the UNEMPLOYMENT INSURANCE CODE of California, in that said defendant(s) although required by the Unemployment Insurance Code to collect, account for, and pay over any tax or amount required to be withheld, did then and there willfully fail to collect and truthfully account for and pay over such tax or amount.

SEVENTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between January 1, 2013 and March 31, 2013, commit a Felony, to wit: ACTING TO EVADE UI TAX, a violation of section 2117.5 of the UNEMPLOYMENT INSURANCE CODE of California, in that said defendant(s) did then and there, within the time required by the Unemployment Insurance Code of California, willfully fail to file a return and report and to supply information, with the intent to evade any tax imposed by such code, and willfully and with like intent, did make, render, sign, and verify a false or fraudulent return, report, and statement and did supply false and fraudulent information.

EIGHTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between January 1, 2013 and March 31, 2013, commit a Felony, to wit: FAILURE TO COLLECT OR PAY OVER UI TAX, a violation of section 2118.5 of the UNEMPLOYMENT INSURANCE CODE of California, in that said defendant(s) although required by the Unemployment Insurance Code to collect, account for, and pay over any tax or amount required to be withheld, did then and there willfully fail to collect and truthfully account for and pay over such tax or amount.

NINTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between October 26, 2010 and October 25, 2011, commit a Felony, to wit: WORKERS' COMPENSATION FRAUD (exp. 12/31/95), a violation of section 11760(a) of the INSURANCE CODE of California, in that said defendant(s) did knowingly make and cause to be made a false and fraudulent statement, orally and in writing, of a fact material to the determination of the premium, rate, and cost of a policy of workers' compensation insurance, for the purpose of reducing the premium, rate, and cost of insurance.

TENTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between October 26, 2011 and October 25, 2012, commit a Felony, to wit: WORKERS' COMPENSATION FRAUD (exp. 12/31/95), a violation of section 11760(a) of the INSURANCE CODE of California, in that said defendant(s) did knowingly make and cause to be made a false and fraudulent statement, orally and in writing, of a fact material to the determination of the premium, rate, and cost of a policy of workers' compensation insurance, for the purpose of reducing the premium, rate, and cost of insurance.

ELEVENTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between October 26, 2012 and June 26, 2013, commit a Felony, to wit: WORKERS' COMPENSATION FRAUD (exp. 12/31/95), a violation of section 11760(a) of the INSURANCE CODE of California, in that said defendant(s) did knowingly make and cause to be made a false and fraudulent statement, orally and in writing, of a fact material to the determination of the premium, rate, and cost of a policy of workers' compensation insurance, for the purpose of reducing the premium, rate, and cost of insurance.

TWELFTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between October 1, 2010 and June 20, 2013, commit a Misdemeanor, to wit: MISDEMEANOR VIOLATION, a violation of section MISC of the GENERAL STATUTES of California, in that said defendant(s) The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, In the County of Alameda, State of California, between October 1, 2010 and June 20, 2013, commit a Misdemeanor, to wit: FAILURE TO PAY MINIMUM WAGE, a violation of section 1199(b) of the LABOR CODE of California, in that said defendant did require and cause Song Soi Lie, an employee, to work for longer hours than those fixed by an order of the Labor Commission.

THIRTEENTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between June 2, 2011 and June 20, 2013, commit a Misdemeanor, to wit: MISDEMEANOR VIOLATION, a violation of section MISC of the GENERAL STATUTES of California, in that said defendant(s) The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, In the County of Alameda, State of California, between June 2, 2011 and June 20, 2013, commit a Misdemeanor, to wit: FAILURE TO PAY MINIMUM WAGE, a violation of section 1199(b) of the LABOR CODE of California, in that said defendant did require and cause Fap Kiun Liu, an employee, to work for longer hours than those fixed by an order of the Labor Commission.

FOURTEENTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between May 28, 2012 and June 20, 2013, commit a Misdemeanor, to wit: MISDEMEANOR VIOLATION, a violation of section MISC of the GENERAL STATUTES of California, in that said defendant(s) The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, In the County of Alameda, State of California, between May 28, 2012 and June 20, 2013, commit a Misdemeanor, to wit: FAILURE TO PAY MINIMUM WAGE, a violation of section 1199(b) of the LABOR CODE of California, in that said defendant did require and cause Victor Tomas Mejia Calgua, an employee, to work for longer hours than those fixed by an order of the Labor Commission.

FIFTEENTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between March 22, 2013 and June 20, 2013, commit a Misdemeanor, to wit: MISDEMEANOR VIOLATION, a violation of section MISC of the GENERAL STATUTES of California, in that said defendant(s) The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, In the County of Alameda, State of California, between March 22, 2013 and June 20, 2013, commit a Misdemeanor, to wit: FAILURE TO PAY MINIMUM WAGE, a violation of section 1199(b) of the LABOR CODE of California, in that said defendant did require and cause Zhang Kai Leng, an employee, to work for longer hours than those fixed by an order of the Labor Commission.

SIXTEENTH COUNT

The Undersigned further deposes and says on Information and belief, that said JI LI ZHENG did, in the County of Alameda, State of California, between June 23, 2013 and June 24, 2013, commit a Felony, to wit: DISSUADING A WITNESS FROM REPORTING A CRIME, a violation of section 136.1(b)(1) of the PENAL CODE of California, in that said defendant(s) did unlawfully attempt to prevent and dissuade Victor Tomas Mejia Calgua and Zhang Kai Leng, a victims and witnesses of a crime from making a report of such victimization to a peace officer, state and local law enforcement officer, probation, parole, and correctional officer, prosecuting agency, and judge.

Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by Penal Code Section 1054.3.

Complainant therefore prays that a warrant issue and that said defendant(s) be dealt with according to law.

Subscribed and sworn to before me,
Thursday, October 17, 2013

/s/ District Attorney-13FIW0021

ERIN LOBACK
Deputy District Attorney
State Bar #226921 slc
Alameda County, California