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7 Attorneys for Plaintiff

8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN
9 Stockton Branch

10 The People of the State of California,
11 Plaintiff,

No. 17-27622
SPD CASE
DA Case: CR-2017-4157250

12 v.

COMPLAINT

13
14 MIMI NGUYEN

15
16
17
18 Defendant(s).

19 I, the undersigned, say, on information and belief, that in the
20 County of SAN JOAQUIN, State of California:

21
22 **COUNT 1: GRAND THEFT BY EMBEZZLEMENT OVER \$950 PC.487(A)**

23 On or about January 1, 2014 through July 12, 2017, in the County of
24 San Joaquin, California, MIMI NGUYEN, did commit the crime of GRAND
25 THEFT BY EMBEZZLEMENT, in violation of Section 487(a) of the Penal
26 Code, a FELONY, who at the time and place last aforesaid did on and
27

1 between JANUARY 1, 2014 through JULY 12, 2017, while said defendant
2 was an agent, servant, and employee of MIRACLE MILE IMPROVMENT
3 DISTRICT, did willfully and unlawfully take from said CORPORATION
4 money and personal property of a value exceeding Nine Hundred and
5 Fifty Dollars (\$950.00), to-wit: **\$59,800.98** IN UNAUTHORIZED CHARGES
6 TO THE BUSINESS CREDIT CARDS PLUS **\$12,842.50** IN INVESTIGATION
7 CHARGES FOR A TOTAL OF **\$72,643.48** LESS \$40,000.00 REPAID FOR A NET
8 RESTITUTION OF **\$32,643.48**.

9
10
11 For a further and separate cause of complaint, being a different
12 statement of the same offense as the charge(s) above, complainant
13 further complains and says:

14 **COUNT 2: ALTER/ETC CORPORATION BOOKS/ETC WITH INTENT TO DEFRAUD**
15 **CC.2255(B)**

16 On or about January 1, 2014 - July 12, 2017, in the County of San
17 Joaquin, California, MIMI NGUYEN, did commit the crime of ALTER/ETC
18 CORPORATION BOOKS/ETC WITH INTENT TO DEFRAUD, in violation of
19 Section 2255(b) of the CORPORATIONS CODE, a FELONY, who at the time
20 and place last aforesaid, in that said defendant, while being a
21 director, officer, agent, and shareholder of a corporation, did
22 willfully, knowingly and unlawfully and with intent to defraud,
23 destroy, alter, mutilate and falsify a book, paper, writing and
24 security belonging to a corporation and fail to make and concur in
25 omitting to make a material entry in the book of accounts and
26 omitting to make a material entry in the book of accounts and other

1 record and document kept by the corporation known as, to-wit: FALSE
2 ENTRIES INTO THE CORPORATIONS' REGISTERS AND RECORDS.

3
4 If the above-named defendant(s) is/are presently on probation in
5 San Joaquin County, any evidence presented at a preliminary hearing
6 in the instant case will be used not only as a basis for a holding
7 order in this case but also as evidence of a violation of probation
8 and, at any formal hearing on that violation of probation, the
9 People will move the transcript of the preliminary hearing into
10 evidence as a basis for the violation.
11

12
13 Pursuant to Penal Code Section 1054.5(b), the People hereby
14 informally request that the defendant and his/her attorney disclose
15 to the People all information and materials described in Penal Code
16 Section 1054.3.

17
18 I declare under penalty of perjury that the foregoing is true and
19 correct except for those things stated on information and belief
20 and those I believe to be true.
21

22 Executed on 10/31/2017, at Stockton, California.
23

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25 
26 Stephen E. Taylor
DEPUTY DISTRICT ATTORNEY

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