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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

FILED
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CENTRAL CRIMINAL
LOS ANGELES SUPERIOR COURT

THE PEOPLE OF THE STATE OF CALIFORNIA, v. 01 SAMUEL LEUNG (DOB: 10/13/1950), and 02 SOFIA DAVID (DOB: 10/30/1959)	Plaintiff, Defendant(s).
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CASE NO. BA465764

WARRANT ISSUED

FELONY COMPLAINT
FOR ARREST WARRANT

DISTRICT ATTORNEY'S OFFICE
PUBLIC INTEGRITY DIVISION
211 WEST TEMPLE STREET, SUITE 1000
LOS ANGELES, CA 90012

The undersigned is informed and believes that:

COUNT 1

On or between January 1, 2009, and February 25, 2015, in the County of Los Angeles, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by SAMUEL LEUNG and SOFIA DAVID, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Campaign Contribution Money Laundering, in violation of Sections 84301 and 84302 of the Government Code; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Los Angeles:

1. On or between January 1, 2009, and February 25, 2015, defendant Leung, defendant David, and other co-conspirators, together caused multiple individuals working for Leung along with Leung's business partners, Leung's relatives, and relatives of Leung's employees and business partners, to make campaign contributions to Los Angeles area politicians with the power and ability to change zoning rules, specifically an industrially zoned property located at 1311 W. Sepulveda Blvd., Los Angeles, which Leung wished to develop into an apartment complex. The contributions included payments to candidates for office as well as reelection campaigns, as well as payments to political action committees and office holder accounts.

[Continued on next page]

- a. On or between March 1, 2011, and March 22, 2011, the aforementioned persons associated with Leung, and at his direction, donated approximately \$35,000 to Janice Hahn's congressional campaign. At the time, Hahn was the Los Angeles City Councilperson for the 15th District which includes 1311 W. Sepulveda Blvd., a property owned by Leung.
- b. On or between January 1, 2012, and January 17, 2012, the aforementioned persons associated with Leung, and at his direction, donated approximately \$20,000 each to the campaigns for Joe Buscaino and Warren Furutani who were competing for the position of Los Angeles City Councilperson for the 15th District.
- c. On or between January 1, 2013, and April 1, 2013, the aforementioned persons associated with Leung, and at his direction, donated approximately \$60,000 to an Eric Garcetti-affiliated political action committee entitled Committee for a Safer Los Angeles.
- d. On or between April 28, 2014, and May 10, 2014, the aforementioned persons associated with Leung, and at his direction, donated approximately \$14,500 to the campaign for Los Angeles City Councilperson Mitch Englander, a member of the Los Angeles City Council's Planning and Land Use Management (PLUM) commission.
- e. On or between May 30, 2014, and October 7, 2014, the aforementioned persons associated with Defendant Leung, and at his direction, donated approximately \$29,000 to the campaign for Los Angeles City Councilperson Jose Huizar, a member of the Los Angeles City Council's PLUM commission.
- f. On or between August 19, 2014, through September 11, 2014, the aforementioned persons associated with Defendant Leung, and at his direction, donated approximately \$8,500 to the campaign for Los Angeles City Councilperson Gil Cedillo, a member of the Los Angeles City Council's PLUM commission.
- g. On or between February 9, 2015, and February 11, 2015, the aforementioned persons associated with Defendant Leung, and at his direction, donated approximately \$7,500 to the campaign for Los Angeles City Councilperson Nury Martinez.

2. On or between January 1, 2009, and February 25, 2015, defendant Leung, defendant David, and other co-conspirators, caused multiple campaign contributors in Los Angeles County to be unlawfully reimbursed for their campaign contributions, and without required disclosures of the fact that the contribution money either originated from, or was reimbursed by, Leung and others acting at his direction.
3. On or between January 1, 2009, through February 25, 2015, defendant Leung used pseudonyms and aliases, as well as the identity of a co-worker without her knowledge and permission, on negotiable instruments Leung uttered in order to make campaign contributions to Los Angeles area politicians, both current and hopefuls, who had the power to vote on zoning rules affecting property he owned.

* * * * *

COUNT 2

On or between January 1, 2009, and February 25, 2015, in the County of Los Angeles, the crime of BRIBING A LEGISLATIVE BODY MEMBER, in violation of PENAL CODE SECTION 85, a Felony, was committed by SAMUEL LEUNG, who did unlawfully offer bribes to a member of a legislative body of a city, county, city and county, and to another person for the member, and attempted by corrupt means, to influence a member in giving and withholding his and her vote.

* * * * *

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR.

NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.

NOTICE: Conviction of this offense prohibits you from owning, purchasing, receiving, possessing, or having under your custody and control any firearms, and effective January 1, 2018, will require you to complete a Prohibited Persons Relinquishment Form (“PPR”) pursuant to Penal Code § 29810.

Further, attached hereto and incorporated herein are official reports and documents of a law enforcement agency which the undersigned believes establish probable cause for the arrest of defendant(s) SAMUEL LEUNG and SOFIA DAVID for the above-listed crimes. Wherefore, a warrant of arrest is requested for SAMUEL LEUNG and SOFIA DAVID.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER BA465764, CONSISTS OF 2 COUNT(S).

Executed at LOS ANGELES, County of Los Angeles, on February 22, 2018.

 #226

JON VAN DIXHORN
DECLARANT AND COMPLAINANT

.....
JACKIE LACEY, DISTRICT ATTORNEY

BY: 

EUGENE HANRAHAN, DEPUTY

AGENCY: LACO D.A. I/O: JON VAN DIXHORN ID NO.: 618107 PHONE:
 BUREAU OF
 INVESTIGATION
DR NO.: 160558 OPERATOR: RM PRELIM. TIME EST.: 5 DAY(S)

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
LEUNG, SAMUEL		10/13/1950		\$20,000	
DAVID, SOFIA		10/30/1959		\$20,000	

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendant(s), the warrant is so ordered.

SAMUEL LEUNG

BAIL: \$ 20,000

SOFIA DAVID

BAIL: \$ 20,000

DATE: 2/23/2018

A 31
Judge of the Above Entitled Court

MICHAEL D. ABZUG



THE DOCUMENT TO WHICH THIS CERTIFICATE IS ATTACHED IS A FULL, TRUE AND CORRECT COPY OF THE ORIGINAL ON FILE AND OF RECORD IN MY OFFICE. SHERRI R. CARTER, EXECUTIVE OFFICER/CLERK OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES.

Attested: 2.23.18 BY: Carlton Rose DEPUTY

FELONY COMPLAINT -- ORDER HOLDING TO ANSWER -- P.C. SECTION 872

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendant(s) guilty thereof, to wit:

(Strike out or add as applicable)

SAMUEL LEUNG

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail		
2	PC 85	2-3-4 Yrs. State Prison		

SOFIA DAVID

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail		

I order that the defendant(s) be held to answer therefore and be admitted to bail in the sum of:

SAMUEL LEUNG _____ Dollars

SOFIA DAVID _____ Dollars

and be committed to the custody of the Sheriff of Los Angeles County until such bail is given. Date of arraignment in Superior Court will be:

SAMUEL LEUNG _____ in Dept _____

SOFIA DAVID _____ in Dept _____

at: _____ A.M.

Date: _____

Committing Magistrate