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**FILED**  
**YOLO SUPERIOR COURT**

DEC 21 2020

By J. Shegman  
Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF YOLO

11 THE PEOPLE OF THE STATE OF  
12 CALIFORNIA,

13 Plaintiff,

14 vs.

15 TAYLOR LEWIS GHOLAR,  
16 SONIA SALIMA CHAN

17 Defendant(s)

Dept. 1

Case No. CR2020-4589

COMPLAINT

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

21 Count 1 : On or about June 10, 2020, SONIA SALIMA CHAN and  
22 TAYLOR LEWIS GHOLAR did commit a FELONY, namely, a violation of  
23 Sections 484(a) and 487(a) of the California Penal Code, GRAND  
24 THEFT WHEN VALUE EXCEEDS \$950 DOLLARS, in that SONIA SALIMA CHAN  
25 and TAYLOR LEWIS GHOLAR did willfully, unlawfully and  
26 feloniously steal, take, obtain, carry, lead and drive away,  
27 from another, personal property, real property, labor and money,  
28 with a value exceeding \$950 dollars.

1 Count 2 : On or about June 10, 2020, SONIA SALIMA CHAN and  
2 TAYLOR LEWIS GHOLAR did commit a FELONY , namely, a violation of  
3 Section 550(a)(5) of the California Penal Code, MAKING FALSE AND  
4 FRAUDULENT INSURANCE CLAIM, in that SONIA SALIMA CHAN and TAYLOR  
5 LEWIS GHOLAR did willfully, unlawfully, and knowingly prepare,  
6 make and subscribe any writing, with intent to present or use  
7 it, and did allow it to be presented, in support of any false  
8 and fraudulent claim.

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10 Count 3 : On or about June 10, 2020, SONIA SALIMA CHAN and  
11 TAYLOR LEWIS GHOLAR did commit a FELONY, namely, a violation of  
12 Section 182(a)(1) of the California Penal Code, CONSPIRACY TO  
13 COMMIT A FELONY, in that SONIA SALIMA CHAN and TAYLOR LEWIS  
14 GHOLAR did willfully and unlawfully conspire with another or  
15 others to commit a felony violation of Section 470(b) of the  
16 California Penal Code, and there did occur in furtherance of  
17 said conspiracy the following OVERT ACT(S):

- 18 1. Conversations between defendants GHOLAR and CHAN  
19 regarding CHAN applying for Unemployment Insurance under  
20 defendant GHOLAR's name while GHOLAR remained in custody.
- 21 2. Defendant CHAN submitted an electronic application for  
22 Unemployment Insurance on behalf of defendant GHOLAR.
- 23 3. Defendant CHAN submitted several amendments to the  
24 Unemployment Insurance claim for address changes on  
25 behalf of defendant GHOLAR.
- 26 4. Defendant CHAN accepted debit cards on behalf defendant  
27 GHOLAR after the Unemployment Insurance Claim was  
28 approved.

1 Count 4 : On or about June 10, 2020, SONIA SALIMA CHAN and  
2 TAYLOR LEWIS GHOLAR did commit a FELONY, namely, a violation of  
3 Section 182(a)(4) of the California Penal Code, CONSPIRACY TO  
4 DEFRAUD, in that SONIA SALIMA CHAN and TAYLOR LEWIS GHOLAR did  
5 willfully and unlawfully conspire with another or others to  
6 cheat and defraud any person of any property, by any means which  
7 are in themselves criminal, and to obtain money and property by  
8 false pretenses and by false promises with fraudulent intent not  
9 to perform such promises, and there did occur in furtherance of  
10 said conspiracy the following OVERT ACT(S):

- 11 1. Conversations between defendants GHOLAR and CHAN  
12 regarding CHAN applying for Unemployment Insurance under  
13 defendant GHOLAR's name while GHOLAR remained in custody.
- 14 2. Defendant CHAN submitted an electronic application for  
15 Unemployment Insurance on behalf of defendant GHOLAR.
- 16 3. Defendant CHAN submitted several amendments to the  
17 Unemployment Insurance claim for address changes on  
18 behalf of defendant GHOLAR.
- 19 4. Defendant CHAN accepted debit cards on behalf defendant  
20 GHOLAR after the Unemployment Insurance Claim was  
21 approved.

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1         Count 5 : On or about June 10, 2020, SONIA SALIMA CHAN did  
2         commit a FELONY, namely, a violation of Section 470(b) of the  
3         California Penal Code, FORGERY OF SEAL OR HANDWRITING, in that  
4         SONIA SALIMA CHAN did willfully, unlawfully, and with intent to  
5         defraud counterfeit and forge the seal and handwriting of  
6         another.

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8         I declare under penalty of perjury that the foregoing is  
9         correct.

10         Executed on December 21, 2020, at Woodland, California.

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12    /s/ Amanda Zambor  
13    Amanda Jayne Zambor/251016  
14    Deputy District Attorney  
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