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(BAR NO. 163589)
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OFFICE OF THE DISTRICT ATTORNEY
70 West Hedding Street, West Wing
San Jose, CA 95110
Telephone: (408) 299-7400

FILED
NOV 19 2020
Clerk of the Court
Superior Court of CA County of Santa Clara
BY M. Castellon DEPUTY

Attorneys for the People of the State of California

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs.

RICK SUNG and HARPREET CHADHA,

Defendant(s).

NO.

REDACTED
INDICTMENT

COUNT 1

The Grand Jury of the County of Santa Clara, State of California hereby makes the following accusation: On or about and between October 1, 2017 and April 30, 2018, in the County of Santa Clara, State of California, the crime of ASKING FOR OR RECEIVING BRIBE BY EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 68(a), a Felony, was committed by RICK SUNG, who did ask, receive, and agree to receive a bribe from Harpreet Chadha, the defendant being a(n) executive officer of the County of Santa Clara, State of

California, upon an agreement and understanding that the vote, opinion and action of the defendant upon any matter then pending and which might be brought before the defendant in his/her official capacity, should be influenced thereby.

COUNT 2

The Grand Jury of the County of Santa Clara, State of California hereby makes the following accusation: On or about and between December 7, 2018 and February 14, 2019, in the County of Santa Clara, State of California, the crime of ASKING FOR OR RECEIVING BRIBE BY EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 68(a), a Felony, was committed by RICK SUNG, who did ask, receive, and agree to receive a bribe from Harpreet Chadha, the defendant being a(n) executive officer of the County of Santa Clara, State of California, upon an agreement and understanding that the vote, opinion and action of the defendant upon any matter then pending and which might be brought before the defendant in his/her official capacity, should be influenced thereby.

COUNT 3

The Grand Jury of the County of Santa Clara, State of California hereby makes the following accusation: On or about and between December 7, 2018 and February 14, 2019, in the County of Santa Clara, State of California, the crime of BRIBING EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by HARPREET CHADHA, who did give and offer to an executive officer in the State of California a bribe, luxury suite tickets to a San Jose Sharks hockey game, with the intent to influence the

executive officer in respect to an act, decision, vote, opinion, and other proceeding as such officer.

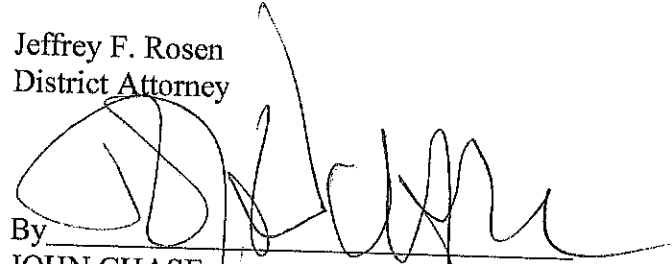
Any defendant, including a juvenile, who is convicted of and pleads guilty and no contest to any felony offense, including any attempt to commit the offense, charged in this indictment is required to provide buccal swab samples, right thumbprints and a full palm print impression of each hand, and any blood specimens or other biological samples required pursuant to the DNA and Forensic Identification Database and Data Bank Act of 1998 and Penal Code section 296, et seq.

DISCOVERY REQUEST

Pursuant to Penal Code sections 1054 through 1054.7, the People request that, within 15 days, the defendant and/or his/her attorney disclose: (A) The names and addresses of persons, other than the defendant, he/she intends to call as witnesses at trial, together with any relevant written or recorded statements of those persons, or reports of the statements of those persons, including any reports or statements of experts made in connection with the case, and including the results of physical or mental examinations, scientific tests, experiments, or comparisons which the defendant intends to offer in evidence at the trial; (B) Any real evidence which the defendant intends to offer in evidence at the trial. This request is a continuing request, to cover not only

all such material currently in existence, but all material which comes into existence to the conclusion of this case.

Jeffrey F. Rosen
District Attorney



By _____
JOHN CHASE
Deputy District Attorney

"A TRUE BILL"

Redacted
PRESIDING GRAND JUROR

Dated: 11/19/20

NAMES OF WITNESSES EXAMINED BY THE GRAND JURY
ON THE FINDING OF THE FOREGOING INDICTMENT

1. Richard Glennon
2. James Neidig
3. Dave Gullo
4. Scott Vermeer
5. William Burns II
6. Eric Mueller
7. Michael Foulkes
8. Jamal Shourbaji
9. James Taranto
10. Michael Doty
11. Rich Urena
12. Jason Brown
13. Joseph Ziegler
14. Charu Shukla
15. Genevieve Wyman
16. Michael Jaynes
17. Tracy Ventimiglio
18. Kim Bourland
19. Florence Koga
20. Reginald Cooks
21. Nelly Mateos
22. Lara McCabe
23. Mike Honda
24. Dave Sanders
25. Dyanne Compton
26. Juan Gallardo
27. Drusilla Gaona
28. Raj Singh
29. Thuy Barnes
30. Jeff Nichols
31. Lacy Hyland
32. Robert Bonsall

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs.

RICK SUNG, JAMES JENSEN & THOMAS MOYER,

Defendant(s).

NO.

REDACTED
INDICTMENT

COUNT 1

The Grand Jury of the County of Santa Clara, State of California hereby makes the following accusation: On or about and between February 8, 2019 and August 7, 2019, in the County of Santa Clara, State of California, the crime of ASKING FOR OR RECEIVING BRIBE BY EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 68(a), a Felony, was committed by RICK SUNG and JAMES JENSEN, who did ask, receive, and agree to receive a bribe from Thomas Moyer, the defendants being executive officers of the County of Santa

Clara, State of California, upon an agreement and understanding that the action of the defendants upon any matter then pending and which might be brought before the defendants in their official capacity, should be influenced thereby.

COUNT 2

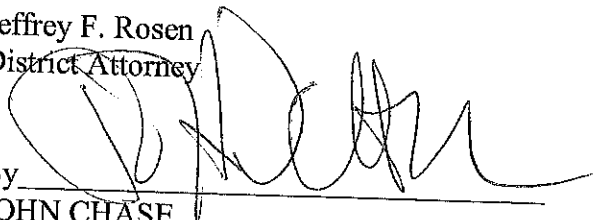
The Grand Jury of the County of Santa Clara, State of California hereby makes the following accusation: On or about and between February 8, 2019 and August 7, 2019, in the County of Santa Clara, State of California, the crime of BRIBING EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by THOMAS MOYER, who did give and offer to an executive officer in the State of California a bribe, a promise of iPads to the Sheriff's Office, with the intent to influence the executive officer in respect to an act, decision, vote, opinion, and other proceeding as such officer.


Any defendant, including a juvenile, who is convicted of and pleads guilty and no contest to any felony offense, including any attempt to commit the offense, charged in this indictment is required to provide buccal swab samples, right thumbprints and a full palm print impression of each hand, and any blood specimens or other biological samples required pursuant to the DNA and Forensic Identification Database and Data Bank Act of 1998 and Penal Code section 296, et seq.

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