

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA
HALL OF JUSTICE

(ENDORSED)

FILED

AUG 20 2020

COMPLAINT FOR ARREST WARRANT(S)

CHRISTIAN WEST EGA337

BY [Signature] DEPUTY

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

vs.

CHRISTIAN WEST (06/01/1969),
aka CHRISTIAN VEST HANSEN,
77 N. ALMADEN AVE., #829 SAN JOSE CA 95110

Defendant(s).

2010724

FELONY COMPLAINT

DA NO: 200815656
CEN
EGA337 CW

The undersigned is informed and believes that:

COUNT 1

On or about and between April 17, 2018 and August 1, 2019, in the County of Santa Clara, State of California, the crime of CONSPIRACY BETWEEN DEFENDANT AND OTHERS, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by CHRISTIAN WEST who did conspire together and with James Jensen, Harpaul Nahal, Michael Nichols, Christopher Schumb, and Martin Nielsen to commit the crime of solicitation of acceptance of a bribe, a violation of section 653f(a) of the Penal Code of the State of California.

OVERT ACT 1

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about April 30, 2018, to help AS Solution, Inc. manager Martin Nielsen procure hard-to-obtain CCW licenses for his company's executive protection agents, local gun parts manufacturer MICHAEL NICHOLS texted attorney HARPAUL NAHAL: "I need you to meet my buddy that runs the Facebook Executive protection team" followed by: "it's a potential \$50K."

OVERT ACT 2

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about May 3, 2018, Martin Nielsen and AS Solution, Inc. CEO Christian West met with MICHAEL NICHOLS, HARPAUL NAHAL, and attorney CHRISTOPHER SCHUMB at the Sainte Claire Club in San Jose, at which meeting CHRISTOPHER SCHUMB described his fundraising for the re-election of Santa Clara County Sheriff Laurie Smith and encouraged Martin Nielsen to attend the "Best in the West" SWAT competition hosted by the Santa Clara County Sheriff's Office and seek out Santa Clara County Sheriff's Lieutenant JAMES JENSEN.

OVERT ACT 3

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about May 10, 2018, at the Best in the West, MICHAEL NICHOLS introduced Martin Nielsen to JAMES JENSEN, whereupon they met and agreed in principle that AS Solution's executive protection agents would receive CCW licenses issued by the Sheriff in exchange for a donation from the company.

OVERT ACT 4

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about May 10, 2018, after attending the Best in the West, Martin Nielsen texted Christian West: "Done with SWAT competition. Met the players for CCW issuance. We gonna do drinks and cigars after DC/NY. Up to 3-4 people per address in Santa Clara...it's looking good. Now just timeline for donation and event to present and amount...."

OVERT ACT 5

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about May 29, 2018, Martin Nielsen and Christian West met with JAMES JENSEN, HARPAUL NAHAL, and MICHAEL NICHOLS at the Jamba Juice on Coleman Avenue in San Jose and reached an agreement that CCW licenses would be issued to as many as 10 to 12 AS Solution employees in exchange for a \$90,000 donation supporting the re-election of Sheriff Laurie Smith.

OVERT ACT 6

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about June 19, 2018, in accordance with JAMES JENSEN's instructions to Martin Nielsen, AS Solution, Inc. manager Jack Stromgren directed his executive protection agents who were filling out their CCW license applications to list false employer names and positions and to use false Santa Clara County residence addresses if they did not reside in the county.

OVERT ACT 7

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about July 26, 2018, at Starbucks on Coleman Avenue in San Jose, Martin Nielsen gave now-Captain JAMES JENSEN the CCW license applications of multiple employees of AS Solution, Inc., including himself and Christian West.

OVERT ACT 8

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about July 26, 2018, after the Starbucks meeting, Martin Nielsen texted Christian West "CCWS are in" and "Chris Schaum [sic] will reach out to me soon about financial part."

OVERT ACT 9

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about August 14, 2018, Martin Nielsen texted JAMES JENSEN the email addresses of the AS Solution employees whose CCW license applications he had earlier turned over at Starbucks.

OVERT ACT 10

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about September 26, 2018, after meeting with CHRISTOPHER SCHUMB at Schumb's law office, JAMES JENSEN texted Martin Nielsen that the initial \$45,000 donation for a \$5,000-per-plate fundraising dinner supporting Sheriff Laurie Smith's reelection would only cover nine dinners: "You can only sponsor about to 9 deputies."

OVERT ACT 11

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about September 28, 2018, at Starbucks on Coleman Avenue in San Jose, Martin Nielsen gave JAMES JENSEN a CCW license application of another AS Solution, Inc. employee.

OVERT ACT 12

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about October 2, 2018, Martin Nielsen moved \$45,000 into his personal checking account from \$70,000 that had been wired to his business account from AS Solution, Inc. the day before, and then texted JAMES JENSEN: "Fyi. All set for tomorrow."

OVERT ACT 13

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about October 3, 2018, JAMES JENSEN texted Martin Nielsen the address of CHRISTOPHER SCHUMB's law office.

OVERT ACT 14

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about October 3, 2018, after receiving the address from JAMES JENSEN, Martin Nielsen traveled to CHRISTOPHER SCHUMB's office and handed him a personal check for \$45,000 made payable to the "Santa Clara County Safety Alliance" [sic], referring to an independent expenditure committee supporting the reelection of Sheriff Laurie Smith of which CHRISTOPHER SCHUMB was assistant treasurer.

OVERT ACT 15

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about and between December 5, 2018 and February 1, 2019, Martin Nielsen met with JAMES JENSEN and delivered to him the CCW license application of another AS Solution, Inc. employee.

OVERT ACT 16

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about February 24, 2019, as he was leaving a meeting at CHRISTOPHER SCHUMB's home, Martin Nielsen complained about not having received any CCW licenses, whereupon CHRISTOPHER SCHUMB promised to make a call, and then shortly thereafter did call JAMES JENSEN's work and personal cell phones.

OVERT ACT 17

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about March 12, 2019, during lunch at Antipastos in San Jose, JAMES JENSEN signed Martin Nielsen's range qualification paperwork required for issuance of his CCW license.

OVERT ACT 18

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about March 20, 2019, at the Sheriff's Office's firearms range near Morgan Hill, JAMES JENSEN administered the firearms qualification training and testing to two of the AS Solution, Inc. CCW license applicants.

OVERT ACT 19

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about April 4, 2019, JAMES JENSEN texted Martin Nielsen that the CCW permits for Martin Nielsen and two other AS Solution, Inc. employees were ready to be picked up.

OVERT ACT 20

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about April 5, 2019, Martin Nielsen picked up his CCW license signed by Sheriff Laurie Smith.

OVERT ACT 21

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about July 11, 2019, at the Sheriff's Office Training Center on Hedding Street in San Jose, JAMES JENSEN suggested that Martin Nielsen make the second \$45,000 donation (of the original \$90,000 quoted) to the Sheriff's Advisory Board.

COUNT 2

On or about and between April 17, 2018 and August 1, 2019, in the County of Santa Clara, State of California, the crime of CONSPIRACY BETWEEN DEFENDANT AND OTHERS, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by CHRISTIAN WEST who did conspire together and with James Jensen, Jack Stromgren, Martin Nielsen, and others to commit the crime of filing CCW license applications with false statements, a violation of section 26180(a) of the Penal Code of the State of California.

OVERT ACT 1

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about June 19, 2018, in accordance with Sheriff's Lieutenant JAMES JENSEN's instructions to AS Solution, Inc. manager Martin Nielsen, AS Solution, Inc. manager Jack Stromgren directed his executive protection agents who were filling out their CCW license applications to list false employer names and positions and to use false Santa Clara County residence addresses if they did not reside in the county.

OVERT ACT 2

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about June 22, 2018, following Jack Stromgren's instructions, AS Solution, Inc. employee Rachael Paskvan completed, signed, and submitted to Jack Stromgren her CCW license application falsely listing her employer as "3D Global Consulting," her occupation as "Event Coordinator," and her residence address as "516 Jackson St. Palo Alto."

OVERT ACT 3

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about June 26, 2018, following Jack Stromgren's instructions, AS Solution, Inc. employee Leonard Lawrence completed, signed, and submitted to Jack Stromgren his CCW license application falsely listing his occupation at "AS Solution" as "Facility Supervisor," and his residence address as "516 Jackson Dr. Palo Alto."

OVERT ACT 4

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about July 10, 2018, Jack Stromgren completed and signed his

CCW license application falsely listing his employer as "Asgard Technologies," his occupation as "Director of Operations," and his residence address as "333 Santana Row #324 San Jose."

OVERT ACT 5

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about and between July 10, 2018 and July 26, 2018, Jack Stromgren turned over to Martin Nielsen his CCW license application as well as the CCW license applications of Rachael Paskvan and Leonard Lawrence among others.

OVERT ACT 6

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about July 26, 2018, at Starbucks on Coleman Avenue in San Jose, Martin Nielsen gave now-Captain JAMES JENSEN the CCW license applications of multiple employees of AS Solution, Inc., including himself, Christian West, Jack Stromgren, Rachael Paskvan, and Leonard Lawrence.

OVERT ACT 7

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about December 3, 2018, following Jack Stromgren's instructions, AS Solution, Inc. employee Jonathan Taunton completed and submitted to Jack Stromgren his CCW license application falsely listing his employer as "Asgard Technologies," his occupation as "Transportation Manager," and his residence address as "516 Jackson Dr. Palo Alto."

OVERT ACT 8

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about February 1, 2019, Martin Nielsen met with JAMES JENSEN and delivered to him the CCW license application of Jonathan Taunton.

OVERT ACT 9

That thereafter, at and in the County of Santa Clara, State of California and in the furtherance of the conspiracy and to effect its object, on or about July 11, 2019, Martin Nielsen advised Jack Stromgren by email to have the latest CCW license applicant falsely put "Asgard Technology" as his employer and falsely put "Global site supervisor or North America logistics manager or something close" as his title.

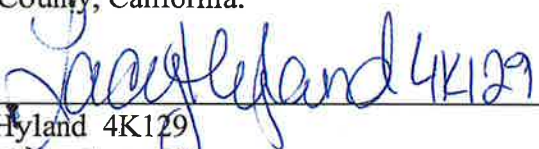
Any defendant, including a juvenile, who is convicted of and pleads guilty and no contest to any felony offense, including any attempt to commit the offense, charged in this complaint or information is required to provide buccal swab samples, right thumbprints and a full palm print impression of each 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.

Further, attached and incorporated by reference is a statement of probable cause which the complainant believes establishes probable cause for the pretrial restraint of defendant CHRISTIAN WEST, for the above-listed crimes.

Complainant therefore requests that the defendant(s) be dealt with according to law.

I certify under penalty of perjury that the above is true and correct.

Executed on August 18, 2020, in SANTA CLARA County, California.


Hyland 4K129
(Hyland 4K129)
DABOI BI-1812-18737
CHASE/ D341/ FELONY/ ES