

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA, ILLINOIS

COUNT 2

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,
ROGER MULTANI

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: ROGER MULTANI, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management, from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 2
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS

SEP 10 2023

CLERK OF THE CIRCUIT COURT
JEFFERSON COUNTY, ILLINOIS

COUNT 3

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates obtained unauthorized control over the property of the property of the Illinois Department of Revenue, the property obtained being a single person pursuant to 725 ILCS 5/111-4(c) to wit: the defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: ROGER MULTANI, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management, from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 3
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 4

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: ROGER MULTANI, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Gas Station Inc, from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Gas Station Inc, to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 4
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 5

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: ROGER MULTANI, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Group Inc., from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Group Inc, to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 5
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 6

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: ROGER MULTANI, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Petroleum Inc.(Knoxville), from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Petroleum Inc.(Knoxville), to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 6
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 7

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: ROGER MULTANI, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Petroleum Inc.(Knoxville), from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Petroleum Inc.(Knoxville), to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeding \$10,000 but less than \$100,000.

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 7
NON-PROBATIONABLE**



COUNT 8

FILED
JULY 20 2023
CLIFF SPEARS
CLERK OF COURT
PEORIA, ILLINOIS

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: ROGER MULTANI, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Petroleum Inc. (Sterling), from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Petroleum Inc. (Sterling), to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 8
NON-PROBATIONABLE**

COUNT 9

FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY ILLINOIS

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: ROGER MULTANI, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Enterprises Inc., from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Enterprises Inc., to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 9
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 10

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: ROGER MULTANI, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Convenience Inc., from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Convenience Inc., to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 10
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 11

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: ROGER MULTANI, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Management Inc., from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Management Inc., to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 11
NON-PROBATIONABLE**



COUNT 12

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: ROGER MULTANI, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments RSM Management, from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused RSM Management, to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 12
NON-PROBATIONABLE**

FILED
ROBERT M. SPEARS
SEP 10 2023
CLERK OF THE CIRCUIT COURT
PEORIA, ILLINOIS

FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 13

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Gas Station Inc, and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



COUNT 14

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Group Inc., and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.

A handwritten signature in blue ink that reads "John Rosa". The signature is written in a cursive, flowing style.

FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA, ILLINOIS

FILED
ROBERT M. SPEAR
SEP 10 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 15

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Petroleum Inc.(Knoxville), and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



COUNT 16

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Petroleum Inc.(Knoxville), and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$10,000 but less than \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 2 Felony, and against the Peace and Dignity of the People of the State of Illinois.



FILED
M. SPEARGO
SEP 19 2023
CLERK OF DISTRICT COURT
PEORIA, ILLINOIS

COUNT 17

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Petroleum Inc. (Sterling), and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.

A handwritten signature in blue ink that reads "John Koda". The signature is written in a cursive style with a large, looping initial "J".

FILED
ROBERT M. SPEARS
SEP 19 2023
COURT CLERK
PEORIA, ILLINOIS

COUNT 18

FILED
ROBERT M. SWEATY
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Enterprises Inc., and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



COUNT 19

FILED
ROBERT M. STEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Convenience Inc., and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 20

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Management Inc., and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.

FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 21

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on RSM Management, and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13



COUNT 22

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

ROGER MULTANI

committed the offense of **WIRE FRAUD**

in that said defendant knowingly devised a scheme or artifice to defraud the State of Illinois out of money to wit: sales and use tax money due to the Illinois Department of Revenue from the retail establishments Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management and that for the purposes of executing the scheme the defendant did on one or more occasions between the said dates knowingly caused fraudulent sales and use tax information for the retail establishments Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management to be transmitted by wire from his account to the Illinois Department of Revenue in Sangamon County and that the information was fraudulent because it understated the amounts of receipts from Sales from General Merchandise to be disclosed on line 4a of the Return, and that pursuant to Section 5/17-24(d) of the Criminal Code, 720 ILCS 5/17-24(2), the period of limitations for prosecution of this offense begins when the last act in furtherance of the scheme or artifice is committed and the Defendant transmitted or caused to be transmitted fraudulent sales and use tax information on one or more occasions after September 19, 2020

in violation of Illinois Compiled Statutes, Chapter 720, Section 5/17-24(b), a Class 3 Felony, and against the peace and dignity of the people of the state of Illinois.



FILED
ROBERT M. STEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

ORDER

Pursuant to the return of a True Bill by the Grand Jury, The Court orders a warrant to issue with bond set at \$_____.

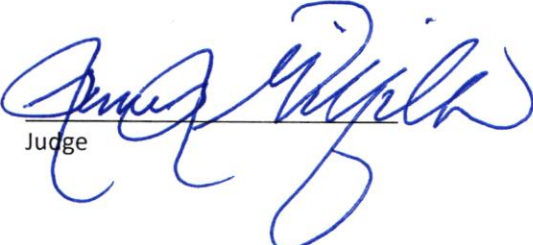
This indictment having been returned in open court on 9/19/2023. This case is hereby assigned to Judge John P Vespa in Courtroom 222. State's Attorney assigned: Mansoor Broachwala.

Defendant has been released pending this case and the Clerk is ordered to notify the Defendant ROGER MULTANI to appear on Arraignment date **Thursday October 26 2023, at 1:15 PM**

The Bill of Indictment is hereby ordered kept secret until the defendant(s) is in custody or has given bond pursuant to Chapter 725 Act 5 Section 6(b) Illinois Compiled Statutes

Bond is presently set on this Indictment set at \$ (10%)

9/19/2023
Entered



Judge

IN THE CIRCUIT COURT
FOR THE TENTH JUDICIAL CIRCUIT OF ILLINOIS
PEORIA COUNTY, PEORIA, ILLINOIS
CRIMINAL DIVISION

FILED
ROBERT M. SPEARS

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS)
)
vs.)
)
JITENDER SINGH,)

No. 2023-CF- 763

BILL OF INDICTMENT
COUNT 1

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant, **JITENDER SINGH**

committed the offense of **THEFT OF PROPERTY OVER \$1,000,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management, from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management, to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$1,000,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

COUNT 1
NON-PROBATIONABLE



FILED
ROBERT M. SPEARS

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 2

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management, from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

COUNT 2
NON-PROBATIONABLE



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 3

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates obtained unauthorized control over the property of the property of the Illinois Department of Revenue, the property obtained being a single person pursuant to 725 ILCS 5/111-4(c) to wit: the defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as “sales tax”) for the retail establishments Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management, from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue (“IDOR”) on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 3
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 4

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Gas Station Inc, from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Gas Station Inc, to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 4
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 5

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Group Inc., from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Group Inc, to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 5
NON-PROBATIONABLE**



SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 6

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Petroleum Inc.(Knoxville), from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Petroleum Inc.(Knoxville), to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 6
NON-PROBATIONABLE**



SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 7

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Petroleum Inc.(Knoxville), from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Petroleum Inc.(Knoxville), to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeding \$10,000 but less than \$100,000.

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 7
NON-PROBATIONABLE**

A handwritten signature in blue ink, appearing to read "John Rosa".

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 8

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Petroleum Inc. (Sterling), from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Petroleum Inc. (Sterling), to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 8
NON-PROBATIONABLE**

A handwritten signature in blue ink, appearing to read "John Kova", is written in a cursive style.

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 9

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Enterprises Inc., from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Enterprises Inc., to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 9
NON-PROBATIONABLE**



SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 10

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Convenience Inc., from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Convenience Inc., to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 10
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 11

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments Kamla Kaur Management Inc., from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused Kamla Kaur Management Inc., to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 11
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 12

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **THEFT OF GOVERNMENTAL PROPERTY OVER \$100,000**

on two or more occasions between the said dates and in furtherance of a single intention or design and pursuant to 725 ILCS 5/111-4(c), the Defendant, or one for whom he is legally accountable, knowingly exerted unauthorized control over property of the owner, the State of Illinois, and intended to permanently deprive the owner of the use and benefit of that property, to wit: JITENDER SINGH, caused tax to be collected pursuant to the Retailers Occupation Tax Act, 35 ILCS 120/1 *et seq.*, and Use Tax Act, 35 ILCS 105/1 *et seq.* (hereafter referred to jointly as "sales tax") for the retail establishments RSM Management, from consumers on sales of tangible personal property at retail which is to be held in trust and for the benefit of the State of Illinois to be remitted to the Illinois Department of Revenue ("IDOR") on the 20th day of the month following the month the sales were made, and on two or more occasions the Defendant knowingly caused RSM Management, to fail to remit a portion of the tax money collected to the State of Illinois; and that the Defendant committed at least one act in furtherance on at least one occasion after September 19th, 2020 and that the aggregate value of the sales tax over which the Defendant exerted unauthorized control exceeded \$100,000,

in violation of Chapter 720 ILCS 5/16-1(a)(1), a Class X Felony, and against the Peace and Dignity of the People of the State of Illinois.

**COUNT 12
NON-PROBATIONABLE**



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 13

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Gas Station Inc, and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 14

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Group Inc., and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



COUNT 15

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Petroleum Inc.(Knoxville), and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



COUNT 16

FILED
ROBERT M. SPEARS
SEP 19 2023

CLERK OF THE DISTRICT COURT
PEORIA COUNTY ILLINOIS

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Petroleum Inc.(Knoxville), and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$10,000 but less than \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 2 Felony, and against the Peace and Dignity of the People of the State of Illinois.



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 17

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Petroleum Inc. (Sterling), and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



FILED
ROBERT M. SPEARS

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 18

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Enterprises Inc., and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



FILED
ROBERT M. SPEARS

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 19

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Convenience Inc., and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



FILED
ROBERT M. SPEARS

SEP 19 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 20

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Management Inc., and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.

A handwritten signature in blue ink, appearing to read "John Rose". The signature is fluid and cursive, with a large initial "J" and "R".

SEP 10 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 21

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on RSM Management, and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13

A handwritten signature in blue ink, appearing to read "John Kosa". The signature is fluid and cursive, with a large loop at the beginning and a long tail extending to the left.

FILED
ROBERT M. SPEARS

SEP 10 2023

CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 22

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

JITENDER SINGH

committed the offense of **WIRE FRAUD**

in that said defendant knowingly devised a scheme or artifice to defraud the State of Illinois out of money to wit: sales and use tax money due to the Illinois Department of Revenue from the retail establishments Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management and that for the purposes of executing the scheme the defendant did on one or more occasions between the said dates knowingly caused fraudulent sales and use tax information for the retail establishments Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management to be transmitted by wire from his account to the Illinois Department of Revenue in Sangamon County and that the information was fraudulent because it understated the amounts of receipts from Sales from General Merchandise to be disclosed on line 4a of the Return, and that pursuant to Section 5/17-24(d) of the Criminal Code, 720 ILCS 5/17-24(2), the period of limitations for prosecution of this offense begins when the last act in furtherance of the scheme or artifice is committed and the Defendant transmitted or caused to be transmitted fraudulent sales and use tax information on one or more occasions after September 19, 2020

in violation of Illinois Compiled Statutes, Chapter 720, Section 5/17-24(b), a Class 3 Felony, and against the peace and dignity of the people of the state of Illinois.



CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS
SEP 19 2023

ORDER

Pursuant to the return of a True Bill by the Grand Jury, The Court orders a warrant to issue with bond set at \$_____.

This indictment having been returned in open court on **9/19/2023**. This case is hereby assigned to Judge **John P Vespa** in Courtroom 222. State's Attorney assigned: **Mansoor Broachwala**.

Defendant has been released pending this case and the Clerk is ordered to notify the Defendant **JITENDER SINGH** to appear on Arraignment date **Thursday October 26 2023, at 1:15 PM**

The Bill of Indictment is hereby ordered kept secret until the defendant(s) is in custody or has given bond pursuant to Chapter 725 Act 5 Section 6(b) Illinois Compiled Statutes

Bond is presently set on this Indictment set at \$ (10%)

9/19/2023
Entered


Judge

COUNT 2

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

SURINDER PAL SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Group Inc., and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.

A handwritten signature in blue ink, appearing to read "John Rada". The signature is fluid and cursive, with a large initial "J" and "R".

COUNT 3

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

SURINDER PAL SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Petroleum Inc.(Knoxville), and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.

A handwritten signature in blue ink, appearing to read "John R. Kuder". The signature is stylized with large loops and a long horizontal stroke at the bottom.

ROBERT PAL SINGH
SEP 19 2020
CLERK OF THE COURT
PEORIA COUNTY, ILLINOIS

COUNT 4

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

SURINDER PAL SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Petroleum Inc.(Knoxville), and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$10,000 but less than \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 2 Felony, and against the Peace and Dignity of the People of the State of Illinois.



FILED
ROBERT M. SPEARS
SEP 19 2023
CLERK OF THE CIRCUIT COURT
PEORIA COUNTY, ILLINOIS

COUNT 5

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

SURINDER PAL SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Petroleum Inc. (Sterling), and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



FILED
ROBERT M. SPEARS
SEP 19 2020
CLERK OF THE DISTRICT COURT
PEORIA, ILLINOIS

COUNT 6

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

SURINDER PAL SINGH

committed the offense of **SALES TAX EVASION**

in that on two or more occasions between the said dates the Defendant knowingly attempted to evade or defeat the tax imposed on Kamla Kaur Enterprises Inc., and the Defendant committed at least one act in furtherance of the evasion, to wit: the Defendant engaged in at least one of the following acts which were designed to conceal, misrepresent, falsify, or manipulate a material fact: (1) The Defendant caused an Illinois Sales and Use Tax Return to be created that understated Line 4a, Sales of General Merchandise; (2) The Defendant caused an Illinois Sales and Use Tax Return that understated Line 4a to be filed with the Illinois Department of Revenue; and that the Defendant committed at least one act in furtherance of the evasion on at least one occasion after September 19, 2020; and that the aggregate amount of tax the assessment of which the Defendant evaded or attempted to be evaded was over \$100,000

in violation of Chapter 35 ILCS 120/13(b), a Class 1 Felony, and against the Peace and Dignity of the People of the State of Illinois.



FILED
ROBERT M. CREATO
SEP 19 2019
CLERK OF THE COURT
PEORIA COUNTY, ILLINOIS

COUNT 7

The Grand Jurors chosen, selected and sworn, in and for the County of Peoria, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about January 1, 2019 through July 20, 2022 at and within the county of Peoria the Defendant,

SURINDER PAL SINGH

committed the offense of **WIRE FRAUD**

in that said defendant knowingly devised a scheme or artifice to defraud the State of Illinois out of money to wit: sales and use tax money due to the Illinois Department of Revenue from the retail establishments Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management and that for the purposes of executing the scheme the defendant did on one or more occasions between the said dates knowingly caused fraudulent sales and use tax information for the retail establishments Kamla Kaur Gas Station Inc, Kamla Kaur Group Inc., Kamla Kaur Petroleum Inc.(Knoxville), Kamla Kaur Petroleum Inc. (Sterling), Kamla Kaur Enterprises Inc., Kamla Kaur Convenience Inc., Kamla Kaur Management Inc., and RSM Management to be transmitted by wire from his account to the Illinois Department of Revenue in Sangamon County and that the information was fraudulent because it understated the amounts of receipts from Sales from General Merchandise to be disclosed on line 4a of the Return, and that pursuant to Section 5/17-24(d) of the Criminal Code, 720 ILCS 5/17-24(2), the period of limitations for prosecution of this offense begins when the last act in furtherance of the scheme or artifice is committed and the Defendant transmitted or caused to be transmitted fraudulent sales and use tax information on one or more occasions after September 19, 2020

in violation of Illinois Compiled Statutes, Chapter 720, Section 5/17-24(b), a Class 3 Felony, and against the peace and dignity of the people of the state of Illinois.



FILED
ROBERT M. CHENARD
SEP 19 2023
CLERK OF THE DISTRICT COURT
PEORIA COUNTY, ILLINOIS

ORDER

Pursuant to the return of a True Bill by the Grand Jury, The Court orders a warrant to issue with bond set at \$_____.

This indictment having been returned in open court on **9/19/2023**. This case is hereby assigned to Judge **John P Vespa** in Courtroom 222. State's Attorney assigned: **Mansoor Broachwala**.

Defendant has been released pending this case and the Clerk is ordered to notify the Defendant **SURINDER PAL SINGH** to appear on Arraignment date **Thursday October 26 2023**, at **1:15 PM**

The Bill of Indictment is hereby ordered kept secret until the defendant(s) is in custody or has given bond pursuant to Chapter 725 Act 5 Section 6(b) Illinois Compiled Statutes

Bond is presently set on this Indictment set at \$ **(10%)**

9/19/2023
Entered


Judge