

1 DA File No. 25M10909
2 **Stephanie A. Bridgett**
3 DISTRICT ATTORNEY
4 Shasta County
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9 Attorney for Plaintiff

FILED

DEC 09 2025

SHASTA COUNTY SUPERIOR COURT
BY: A. BRUNICK, DEPUTY CLERK *AB*

10 **IN THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF SHASTA**

11 THE PEOPLE OF THE STATE OF CALIFORNIA
12 Plaintiff.

13 vs.

14 **AMRIT RAJ KULASEKARAN**
15 **MOHIT RAJ KULASEKARAN**

16 Defendant(s)

COURT No. **25M6306**

COMPLAINT-CRIMINAL

SUPERSEDES CITATION 305349

Next Court Date:

17 DA # 25M10909
18 DEPARTMENT OF FISH AND WILDLIFE FW25070895

19 The District Attorney of Shasta County, by and through the undersigned Deputy District
20 Attorney, on information and belief, complains and accuses defendant(s) of having committed, in
21 the County of Shasta, State of California, the crime(s) of:

22 **COUNT 1**

23 **WATER POLLUTION, in violation of 5650(a)(6) of the Fish and Game Code, a Misdemeanor**

24 Defendants(s)

25 **AMRIT RAJ KULASEKARAN AND MOHIT RAJ KULASEKARAN**

26 On or about 14th day of May, 2025, did willfully and unlawfully deposit in, permit to pass into, or
27 place where it can pass into the waters of this state a substance of material deleterious to fish, plant
28 life, mammals, or bird life.

COUNT 2

WATER POLLUTION, in violation of 5650(a)(6) of the Fish and Game Code, a Misdemeanor

Defendants(s)

AMRIT RAJ KULASEKARAN AND MOHIT RAJ KULASEKARAN

On or about 14th day of May, 2025, did willfully and unlawfully deposit in, permit to pass into, or
place where it can pass into the waters of this state a substance of material deleterious to fish, plant
life, mammals, or bird life.

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3 **COUNT 3**

4 **WATER POLLUTION, in violation of 5650(a)(6) of the Fish and Game Code, a Misdemeanor**

5 Defendants(s)

6 **MOHIT RAJ KULASEKARAN AND AMRIT RAJ KULASEKARAN**

7 On or about 14th day of May, 2025, did willfully and unlawfully deposit in, permit to pass into, or
8 place where it can pass into the waters of this state a substance of material deleterious to fish, plant
life, mammals, or bird life.

9 **COUNT 4**

10 **WATER POLLUTION, in violation of 5650(a)(6) of the Fish and Game Code, a Misdemeanor**

11 Defendants(s)

12 **AMRIT RAJ KULASEKARAN AND MOHIT RAJ KULASEKARAN**

13 On or about 14th day of May, 2025, did willfully and unlawfully deposit in, permit to pass into, or
14 place where it can pass into the waters of this state a substance of material deleterious to fish, plant
life, mammals, or bird life.

15 **COUNT 5**

16 **WATER POLLUTION, in violation of 5650(a)(6) of the Fish and Game Code, a Misdemeanor**

17 Defendants(s)

18 **MOHIT RAJ KULASEKARAN AND AMRIT RAJ KULASEKARAN**

19 On or about 14th day of May, 2025, did willfully and unlawfully deposit in, permit to pass into, or
20 place where it can pass into the waters of this state a substance of material deleterious to fish, plant
life, mammals, or bird life.

21 **COUNT 6**

22 **WATER POLLUTION, in violation of 5650(a)(6) of the Fish and Game Code, a Misdemeanor**

23 Defendants(s)

24 **AMRIT RAJ KULASEKARAN AND MOHIT RAJ KULASEKARAN**

25 On or about 14th day of May, 2025, did willfully and unlawfully deposit in, permit to pass into, or
26 place where it can pass into the waters of this state a substance of material deleterious to fish, plant
life, mammals, or bird life.
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3 **COUNT 7**

4 **WATER POLLUTION, in violation of 5650(a)(6) of the Fish and Game Code, a Misdemeanor**

5 Defendants(s)

6 **MOHIT RAJ KULASEKARAN AND AMRIT RAJ KULASEKARAN**

7 On or about 14th day of May, 2025, did willfully and unlawfully deposit in, permit to pass into, or
8 place where it can pass into the waters of this state a substance of material deleterious to fish, plant
life, mammals, or bird life.

9 **COUNT 8**

10 **WATER POLLUTION, in violation of 5650(a)(6) of the Fish and Game Code, a Misdemeanor**

11 Defendants(s)

12 **AMRIT RAJ KULASEKARAN AND MOHIT RAJ KULASEKARAN**

13 On or about 14th day of May, 2025, did willfully and unlawfully deposit in, permit to pass into, or
14 place where it can pass into the waters of this state a substance of material deleterious to fish, plant
life, mammals, or bird life.

15 **COUNT 9**

16 **WATER POLLUTION, in violation of 5650(a)(6) of the Fish and Game Code, a Misdemeanor**

17 Defendants(s)

18 **MOHIT RAJ KULASEKARAN AND AMRIT RAJ KULASEKARAN**

19 On or about 14th day of May, 2025, did willfully and unlawfully deposit in, permit to pass into, or
20 place where it can pass into the waters of this state a substance of material deleterious to fish, plant
life, mammals, or bird life.

21 **COUNT 10**

22 **DIVERT OR OBSTRUCT THE NATURAL FLOW OF A RIVER OR STREAM, in violation**
23 **of 1602(a) of the Fish and Game Code, a Misdemeanor**

24 Defendants(s)

25 **MOHIT RAJ KULASEKARAN AND AMRIT RAJ KULASEKARAN**

26 On or about 14th day of May, 2025, did willfully and unlawfully substantially divert or obstruct the
27 natural flow or substantially change the bed, channel or bank of a river or stream designated by the
28 Department of Fish and Game or used material from streambeds without first notifying the
Department of Fish and Game of such activity or engaged in a project or activity affected by this
section, such project or activity not being conducted in accordance with the department's proposals
or the decisions of the panel of arbitrators.

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3 **COUNT 11**

4 **DIVERT OR OBSTRUCT THE NATURAL FLOW OF A RIVER OR STREAM, in violation**
5 **of 1602(a) of the Fish and Game Code, a Misdemeanor**

6 Defendants(s)

7 **AMRIT RAJ KULASEKARAN AND MOHIT RAJ KULASEKARAN**

8 On or about 14th day of May, 2025, did willfully and unlawfully substantially divert or obstruct the
9 natural flow or substantially change the bed, channel or bank of a river or stream designated by the
10 Department of Fish and Game or used material from streambeds without first notifying the
11 Department of Fish and Game of such activity or engaged in a project or activity affected by this
12 section, such project or activity not being conducted in accordance with the department's proposals
13 or the decisions of the panel of arbitrators.

14
15 **COUNT 12**

16 **DIVERT OR OBSTRUCT THE NATURAL FLOW OF A RIVER OR STREAM, in violation**
17 **of 1602(a) of the Fish and Game Code, a Misdemeanor**

18 Defendants(s)

19 **MOHIT RAJ KULASEKARAN AND AMRIT RAJ KULASEKARAN**

20 On or about 14th day of May, 2025, did willfully and unlawfully substantially divert or obstruct the
21 natural flow or substantially change the bed, channel or bank of a river or stream designated by the
22 Department of Fish and Game or used material from streambeds without first notifying the
23 Department of Fish and Game of such activity or engaged in a project or activity affected by this
24 section, such project or activity not being conducted in accordance with the department's proposals
25 or the decisions of the panel of arbitrators.

26
27 **COUNT 13**

28 **DIVERT OR OBSTRUCT THE NATURAL FLOW OF A RIVER OR STREAM, in violation**
of 1602(a) of the Fish and Game Code, a Misdemeanor

Defendants(s)

AMRIT RAJ KULASEKARAN AND MOHIT RAJ KULASEKARAN

On or about 14th day of May, 2025, did willfully and unlawfully substantially divert or obstruct the
natural flow or substantially change the bed, channel or bank of a river or stream designated by the
Department of Fish and Game or used material from streambeds without first notifying the
Department of Fish and Game of such activity or engaged in a project or activity affected by this
section, such project or activity not being conducted in accordance with the department's proposals
or the decisions of the panel of arbitrators.

COUNT 14

DIVERT OR OBSTRUCT THE NATURAL FLOW OF A RIVER OR STREAM, in violation of 1602(a) of the Fish and Game Code, a Misdemeanor

Defendants(s)

MOHIT RAJ KULASEKARAN AND AMRIT RAJ KULASEKARAN

On or about 14th day of May, 2025, did willfully and unlawfully substantially divert or obstruct the natural flow or substantially change the bed, channel or bank of a river or stream designated by the Department of Fish and Game or used material from streambeds without first notifying the Department of Fish and Game of such activity or engaged in a project or activity affected by this section, such project or activity not being conducted in accordance with the department's proposals or the decisions of the panel of arbitrators.

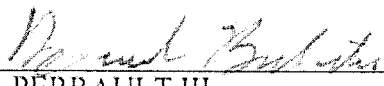
COUNT 15

DIVERT OR OBSTRUCT THE NATURAL FLOW OF A RIVER OR STREAM, in violation of 1602(a) of the Fish and Game Code, a Misdemeanor

Defendants(s)

AMRIT RAJ KULASEKARAN AND MOHIT RAJ KULASEKARAN

On or about 14th day of May, 2025, did willfully and unlawfully substantially divert or obstruct the natural flow or substantially change the bed, channel or bank of a river or stream designated by the Department of Fish and Game or used material from streambeds without first notifying the Department of Fish and Game of such activity or engaged in a project or activity affected by this section, such project or activity not being conducted in accordance with the department's proposals or the decisions of the panel of arbitrators.


GEORGE PERRAULT III
DEPUTY DISTRICT ATTORNEY

Subscribed and sworn on December 8, 2025

Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the people as required by Penal Code Section 1054.3.

GP/aw