

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
JOSHUA TREE DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)	
)	
Plaintiff)	
)	
vs.)	
)	
Nicholas Corey Plummer , aka Nicholas C Plummer, aka Nicholas Cory Plummer)	FELONY COMPLAINT
)	
)	
Defendant)	DA CASE NO 2020-00-0040526

The undersigned is informed and believes that:

COUNT 1

On or about August 29, 2020, in the above named judicial district, the crime of ATTEMPTED WILLFUL, DELIBERATE, AND PREMEDITATED ATTEMPTED MURDER, in violation of PENAL CODE SECTION 664/187(a), a felony, was committed by Nicholas Corey Plummer, who did unlawfully and with malice aforethought attempt to murder Jane Doe #1, a human being.

It is further alleged that the aforesaid attempted murder was committed willfully, deliberately and with premeditation within the meaning of Penal Code section 664(a).

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: This offense is a serious felony and a violent felony within the meaning of Penal Code sections 1192.7(c)(8) and 667.5(c)(8)."

COUNT 2

On or about August 29, 2020, in the above named judicial district, the crime of ASSAULT WITH A DEADLY WEAPON, in violation of PENAL CODE SECTION 245(a)(1), a felony, was committed by Nicholas Corey Plummer, who did willfully and unlawfully commit an assault upon Jane Doe #1 with a deadly weapon, to wit, Knife.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

"NOTICE: This offense is a serious felony and a violent felony within the meaning of Penal Code sections 1192.7(c)(8) and 667.5(c)(8)."

COUNT 3

On or about August 29, 2020, in the above named judicial district, the crime of ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY, in violation of PENAL CODE SECTION 245(a)(4), a felony, was committed by Nicholas Corey Plummer, who committed an assault on the person of Jane Doe #1 by means of force likely to produce great bodily injury.

"NOTICE: This offense is a serious felony and a violent felony within the meaning of Penal Code sections 1192.7(c)(8) and 667.5(c)(8)."

COUNT 4

On or about August 29, 2020, in the above named judicial district, the crime of CRIMINAL THREATS, in violation of PENAL CODE SECTION 422(a), a felony, was committed by Nicholas Corey Plummer, who did willfully and unlawfully threaten to commit a crime which would result in death and great bodily injury to Jane Doe #1, with the specific intent that the statement be taken as a threat.

It is further alleged that the threatened crime, on its face and under the circumstances in which it was made, was so unequivocal, unconditional, immediate and specific as to convey to Jane Doe #1 a gravity of purpose and an immediate prospect of execution.

It is further alleged that the said Jane Doe #1 was reasonably in sustained fear of her safety and the safety of her immediate family.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

COUNT 5

On or about August 29, 2020, in the above named judicial district, the crime of INJURING A SPOUSE, COHABITANT, FIANCE, BOYFRIEND, GIRLFRIEND OR CHILD'S PARENT, in violation of PENAL CODE SECTION 273.5(a), a felony, was committed by Nicholas Corey Plummer, who willfully inflicted corporal injury resulting in a traumatic condition upon Jane Doe #1, who was the defendant's spouse.

"NOTICE: This offense is a serious felony and a violent felony within the meaning of Penal Code sections 1192.7(c)(8) and 667.5(c)(8)."

It is further alleged as to Counts 1, 2, 3, and 5 that in the commission of the above offenses the said defendant, Nicholas Corey Plummer, personally inflicted great bodily injury upon Jane Doe #1, not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offenses to become serious felonies within the meaning of Penal Code Section 1192.7(c)(8) and violent felonies within the meaning of Penal Code Section 667.5(c)(8).

It is further alleged as to Counts 1, 2, 3, and 5 that in the commission and attempted commission of the above offenses, the said defendant, Nicholas Corey Plummer, personally used a deadly and dangerous weapon, to wit, Knife, said use not being an element of the above offenses, within the meaning of Penal Code Section 12022(b)(1) and causing the above offense to be a serious felony within the meaning of Penal Code section 1192.7(c)(23).

COUNT 6

On or about August 29, 2020, in the above named judicial district, the crime of CRIMINAL THREATS, in violation of PENAL CODE SECTION 422(a), a felony, was committed by Nicholas Corey Plummer, who did willfully and unlawfully threaten to commit a crime which would result in death and great bodily injury to Jane Doe #2, with the specific intent that the statement be taken as a threat.

It is further alleged that the threatened crime, on its face and under the circumstances in which it was made, was so unequivocal, unconditional, immediate and specific as to convey to Jane Doe #2 a gravity of purpose and an immediate prospect of execution.

It is further alleged that the said Jane Doe #2 was reasonably in sustained fear of her safety and the safety of her immediate family.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

COUNT 7

On or about August 29, 2020, in the above named judicial district, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Nicholas Corey Plummer, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, Jane Doe #2, to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that her person and health were endangered.

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NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 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.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 7 COUNT(S).

Executed at Joshua Tree, California, on September 1, 2020.

Jason M. Gueltzow
Jason M. Gueltzow
DECLARANT AND COMPLAINANT

Agency: Morongo Basin Sheriff Station

Prelim Est. 00:00

Defendant Nicholas Corey Plummer	Birth Date 10/01/1984	Booking No.	CII No. A29130832	NCIC
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