# SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO RANCHO CUCAMONGA DISTRICT

THE PEOPLE OF THE STA	ATE OF CALIFORNIA,	)
	Plaintiff	, ) )
vs. Brandon McDonald		) ) ) FELONY COMPLAINT ) )
	Defendant	) ) DA CASE NO 2020-00-0045809

The undersigned is informed and believes that:

## COUNT 1

On or about July 24, 2020 through August 3, 2020, in the above named judicial district, the crime of HUMAN TRAFFICKING OF A MINOR FOR A SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a felony, was committed by Brandon McDonald, who did willfully and unlawfully cause, induce and/or persuade, Adair G., who was less than 18 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a violation of Penal Code section 266h.

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# **COUNT 2**

On or about July 24, 2020 through August 3, 2020, in the above named judicial district, the crime of PANDERING BY PROCURING, in violation of PENAL CODE SECTION 266i(a)(1), a felony, was committed by Brandon McDonald, who did unlawfully procure Adair G., another person, for the purpose of prostitution.

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## COUNT 3

On or about July 24, 2020 through August 3, 2020, in the above named judicial district, the crime of HUMAN TRAFFICKING OF A MINOR FOR A SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a felony, was committed by Brandon McDonald, who did willfully and unlawfully cause, induce and/or persuade, Ayna R., who was less than 18 years of age, to engage

in a commercial sex act, with the intent to effect and/or maintain a violation of Penal Code section 266h.

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# **COUNT 4**

On or about July 24, 2020 through August 3, 2020, in the above named judicial district, the crime of PIMPING A MINOR 16 YEARS OF AGE OR OLDER, in violation of PENAL CODE SECTION 266h(b)(1), a felony, was committed by Brandon McDonald, who did unlawfully, knowing Jane Doe, a minor sixteen years of age or older, was a prostitute, live and derive support and maintenance in whole and in part from the earnings and proceeds of Anya R., and from money loaned and advanced to and charged against Anya R. by a keeper, manager, and inmate of a house and other place where prostitution was practiced and allowed, and did solicit and receive compensation for soliciting for Anya R.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Penal Code 1203.065(a) prohibits a grant of probation for this offense."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

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## **COUNT 5**

On or about July 24, 2020 through August 3, 2020, in the above named judicial district, the crime of PANDERING BY PROCURING A MINOR OVER AGE 16, in violation of PENAL CODE SECTION 266i(b)(1), a felony, was committed by Brandon McDonald, who did unlawfully, procure Anya R., another person who was a minor over the age of sixteen years, for the purpose of prostitution.

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

# 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 5 COUNTS.

Executed at Rancho Cucamonga, California, on October 2, 2020.

Cassandra Helmuth Cassandra Helmuth DECLARANT AND COMPLAINANT

Agency: SB Sheriff Vice/Narcotics/Gangs Prelim Est. 00:00

Page 3

DA CASE NO: 2020-00-0045809

Defendant Birth Date Booking No. CII No. NCIC Brandon McDonald 10/11/1995 A36696394