# SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO SAN BERNARDINO JUSTICE CENTER DISTRICT

THE PEOPLE OF THE STATE O	F CALIFORNIA,	)
	Plaintiff	, ) )
vs. Charles Lee Stapleton		) ) FELONY COMPLAINT ) )
	Defendant	) DA CASE NO 2020-00-0053464

The undersigned is informed and believes that:

#### COUNT 1

On or about November 14, 2020, in the above named judicial district, the crime of FIRST DEGREE RESIDENTIAL BURGLARY, in violation of PENAL CODE SECTION 459, a felony, was committed by Charles Lee Stapleton, who did enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by Jane Doe, with the intent to commit larceny and any felony.

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

It is further alleged that the above offense is a violation of Penal Code Section 462(a).

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## **COUNT 2**

On or about November 14, 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 Charles Lee Stapleton, who did willfully and unlawfully threaten to commit a crime which would result in death and great bodily injury to Jane Doe, 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 a gravity of purpose and an immediate prospect of execution.

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

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

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#### **COUNT 3**

On or about November 14, 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 Charles Lee Stapleton, who willfully inflicted corporal injury resulting in a traumatic condition upon Jane Doe, who was the defendant's former cohabitant.

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#### **COUNT 4**

On or about November 14, 2020, in the above named judicial district, the crime of FALSE IMPRISONMENT BY VIOLENCE, in violation of PENAL CODE SECTION 236, a felony, was committed by Charles Lee Stapleton, who did unlawfully violate the personal liberty of Jane Doe, said violation being effected by violence, menace, fraud, and deceit.

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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 4 COUNT(S).

Executed at San Bernardino, California, on November 20, 2020.

D. Rabb
D. Rabb
DECLARANT AND COMPLAINANT

Agency: Big Bear Sheriff Station Prelim Est. 00:00

Defendant Birth Date Booking No. CII No. NCIC Charles Lee Stapleton 04/07/1972 2011060022 A10348237