

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)	
)	
Plaintiff)	FIRST AMENDED
)	
vs.)	FELONY COMPLAINT
)	
Mose Marquellius Thomas (FWV20004573), aka Mose Thomas, aka Thomas Mose)	
)	DA CASE NO. 2020-00-0058996
)	
Defendant)	

The undersigned is informed and believes that:

COUNT 1

On or about December 20, 2020, in the above named judicial district, the crime of DISCHARGE OF FIREARM WITH GROSS NEGLIGENCE, in violation of PENAL CODE SECTION 246.3(a), a felony, was committed by Mose Marquellius Thomas, who did willfully and unlawfully discharge a firearm in a grossly negligent manner which could result in injury and death to a person.

"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)."

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It is further alleged, within the meaning of Penal Code section 12022.7(e), as to count 1 that in the commission of the above offense, the said defendant Mose Marquellius Thomas, personally inflicted great bodily injury upon Jane Doe, under circumstances involving domestic violence.

"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 December 20, 2020, in the above named judicial district, the crime of POSSESSION OF FIREARM BY A FELON, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by Mose Marquellus Thomas, who did unlawfully own, purchase, receive, possess, and have custody and control of a firearm, to wit, Handgun, the said defendant having been convicted of a felony under the laws of the United States, the state of California and any other state, government and county:

Court Case	Code/Statute	Conv Date	County	State	Court Type
15 0093614133356	39-14-403	03/07/2016	Shelby	TN	Superior

COUNT 3

On or about December 20, 2020, in the above named judicial district, the crime of UNLAWFUL POSSESSION OF AMMUNITION, in violation of PENAL CODE SECTION 30305(a)(1), a felony, was committed by Mose Marquellus Thomas, who did unlawfully own, possess and have under control ammunition and reloaded ammunition.

It is further alleged that the defendant is prohibited from owning or possessing a firearm pursuant to Chapter 2 and 3 of Division 9 and sections 8100 and 8103 of the Welfare and Institutions Code.

* * * * *

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 3 COUNTS.

Executed at Rancho Cucamonga, California, on January 5, 2021.

Daphne Sanders
Daphne Sanders
DECLARANT AND COMPLAINANT

Agency: Fontana Police Department

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Mose Marquelius Thomas	12/01/1986		A38865072	