

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

THE PEOPLE OF THE STATE OF CALIFORNIA, )  
 )  
 ) Plaintiff )  
 )  
 vs. )  
 )  
 Andrew Robert Downs ) FELONY COMPLAINT  
 )  
 )  
 ) Defendant ) DA CASE NO 2021-00-0001282

---

The undersigned is informed and believes that:

COUNT 1

On or about January 7, 2021, in the above named judicial district, the crime of CRIMINAL THREATS, in violation of PENAL CODE SECTION 422(a), a felony, was committed by Andrew Robert Downs, who did willfully and unlawfully threaten to commit a crime which would result in death and great bodily injury to Maria Esmeralda Downs , 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 Maria Esmeralda Downs a gravity of purpose and an immediate prospect of execution.

It is further alleged that the said Maria Esmeralda Downs 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)."

\*\*\*\*\*

COUNT 2

On or about January 7, 2021, 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 Andrew Robert Downs, who did willfully and unlawfully commit an assault upon Robert Lewis Downs with a deadly weapon, to wit, Other.

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

It is further alleged as to count(s) 2 that in the commission of the above offense the said defendant(s) Andrew Robert Downs, personally inflicted great bodily injury upon Robert Lewis Downs, not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8) and a violent felony within the meaning of Penal Code Section 667.5(c)(8).

"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)."

\*\*\*\*\*

\* \* \* \* \*

**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 2 COUNT(S).

Executed at San Bernardino, California, on January 11, 2021.

BHouser  

---

BHouser  
DECLARANT AND COMPLAINANT

Agency: Yucaipa Sheriff Station

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Andrew Robert Downs	04/03/1995	2101300242	A36294832	