SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO VICTORVILLE DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)
Plaintiff	,))
Vs. Andrew Manuel Espinoza , aka Andrew Espinoza, Vanessa Loraine Amaya , aka Vanessa Amaya, aka Vanessa L Amaya) FELONY COMPLAINT))) DA CASE NO 2021-00-0001328
Defendant)

The undersigned is informed and believes that:

COUNT 1

On or about January 7, 2021, in the above named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Andrew Manuel Espinoza, who did unlawfully, and with malice aforethought murder Christian Jose Ruiz, a human being.

"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)."

It is further alleged as to count(s) 1 that said defendant(s) Andrew Manuel Espinoza personally and intentionally discharged a firearm, a handgun, which proximately caused great bodily injury and death to Christian Jose Ruiz within the meaning of Penal Code section 12022.53(d).

COUNT 2

On or about January 7, 2021, in the above named judicial district, the crime of ACCESSORY AFTER THE FACT-(KNOWLEDGE OF CRIME), in violation of PENAL CODE SECTION 32, a felony, was committed by Vanessa Loraine Amaya, who unlawfully, having knowledge that the crime of MURDER, a felony, in violation of Section 187 of the PENAL Code of the State of California had been committed by Andrew Espinoza, did harbor, conceal, and aid said Andrew Espinoza, with the intent that he/she might avoid and escape from arrest, trial, conviction, and punishment for said felony.

* * * * *

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 Victorville, California, on January 11, 2021.

Britt P. Imes
Britt P. Imes
DECLARANT AND COMPLAINANT

Agency: Hesperia Police Department Prelim Est. 00:00

 Defendant
 Birth Date
 Booking No.
 CII No.
 NCIC

 Andrew Manuel Espinoza
 12/25/1991
 2101300253
 A32635124

 Vanessa Loraine Amaya
 02/08/1991
 2101300248
 A30421419