

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)
)
) Plaintiff)
)
) vs.)
)
) FELONY COMPLAINT)
)
) Jorge Adan Pelayo Jr)
)
)
)
) Defendant)
) DA CASE NO 2018-00-0015204)

The undersigned is informed and believes that:

COUNT 1

On or about March 15, 2018, in the above named judicial district, the crime of KIDNAPPING, in violation of PENAL CODE SECTION 207(a), a felony, was committed by Jorge Adan Pelayo Jr, who did unlawfully, forcibly and by instilling fear, steal, take, hold, detain and arrest Roberto Michael Michel in San Bernardino County, California, and did take the said Roberto Michael Michel into another country, state, county and another part of San Bernardino County.

"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) Jorge Adan Pelayo Jr personally used a firearm, a handgun, within the meaning of Penal Code Section 12022.53(b) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

COUNT 2

On or about March 15, 2018, in the above named judicial district, the crime of EXHIBITING A FIREARM, in violation of PENAL CODE SECTION 417(a)(2), a misdemeanor, was committed by Jorge Adan Pelayo Jr, who did unlawfully, in the presence of another, draw and exhibit a firearm,

whether loaded or unloaded, in a rude, angry and threatening manner and did use a firearm in a fight and quarrel.

COUNT 3

On or about March 15, 2018, in the above named judicial district, the crime of EXHIBITING A FIREARM, in violation of PENAL CODE SECTION 417(a)(2), a misdemeanor, was committed by Jorge Adan Pelayo Jr, who did unlawfully, in the presence of another, draw and exhibit a firearm, whether loaded or unloaded, in a rude, angry and threatening manner and did use a firearm in a fight and quarrel.

* * * * *

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 COUNT(S).

Executed at San Bernardino, California, on March 20, 2018.

Simon R. Umscheid

Simon R. Umscheid

DECLARANT AND COMPLAINANT

Agency: San Bernardino Police Department

Prelim Est. 00:00

Defendant

Jorge Adan Pelayo Jr

Birth Date

07/24/1999

Booking No.

1803341780

CII No.

A36737254

NCIC