

It is further alleged pursuant to **Penal Code section 186.22(b)(1)(C)** as to count 1 that the above offense was committed in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 186.30(a). Willful failure to register is a crime."

COUNT 2

On or about October 17, 2020, in the above named judicial district, the crime of SEXUAL PENETRATION BY USE OF FORCE, in violation of **PENAL CODE SECTION 289(a)(1)(A)**, a felony, was committed by **Barnard Lamar Saddler** and **Kenneth Earl Watson Jr.**, who committed an act of sexual penetration against the will of Jane Doe by means of force, violence, duress, menace and fear of immediate and unlawful bodily injury on Jane Doe and another person.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Being charged with this criminal offense can result in mandatory pre-conviction HIV/AIDS testing and disclosure of the results to a victim and the Chief Medical Officer of the jail or prison facility where you are incarcerated pursuant to Penal Code Section 1524.1 and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order."

"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 pursuant to **Penal Code section 186.22(b)(1)(C)** as to count 2 that the above offense was committed in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 186.30(a). Willful failure to register is a crime."

COUNT 3

On or about October 17, 2020, in the above named judicial district, the crime of FORCIBLE ORAL COPULATION, in violation of **PENAL CODE SECTION 287(c)(2)(A)**, a felony, was committed by **Barnard Lamar Saddler** and **Kenneth Earl Watson Jr.**, who did unlawfully participate in an act of oral copulation with Jane Doe and did accomplish said act against said victim's will by force, violence, duress, menace, and fear of immediate and unlawful bodily injury to said victim and to another.

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"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 pursuant to **Penal Code section 186.22(b)(1)(C)** as to count 3 that the above offense was committed in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 186.30(a). Willful failure to register is a crime."

COUNT 4

On or about October 17, 2020, in the above named judicial district, the crime of SECOND DEGREE ROBBERY, in violation of **PENAL CODE SECTION 211**, a felony, was committed by **Barnard Lamar Saddler** and **Kenneth Earl Watson Jr**, who did unlawfully, and by means of force and fear take personal property from the person, possession, and immediate presence of Jane Doe.

"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 pursuant to **Penal Code section 186.22(b)(1)(C)** as to count 4 that the above offense was committed in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 186.30(a). Willful failure to register is a crime."

COUNT 5

On or about October 17, 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 **Barnard Lamar Saddler** and **Kenneth Earl Watson Jr**, 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 her safety.

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

It is further alleged pursuant to **Penal Code section 186.22(b)(1)(B)** as to count 5 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 186.30(a). Willful failure to register is a crime."

COUNT 6

On or about October 17, 2020, in the above named judicial district, the crime of STREET TERRORISM, in violation of **PENAL CODE SECTION 186.22(a)**, a felony, was committed by **Barnard Lamar Saddler** and **Kenneth Earl Watson Jr**, who did unlawfully and actively participate in a criminal street gang with knowledge that its members engage in or have engaged in a pattern of criminal gang activity and did promote, further or assist in felony criminal conduct by gang members.

COUNT 7

On or about October 17, 2020, in the above named judicial district, the crime of FORCIBLE RAPE, in violation of **PENAL CODE SECTION 261(a)(2)**, a felony, was committed by **Barnard Lamar Saddler** and **Kenneth Earl Watson Jr.**, who did unlawfully have and accomplish an act of sexual intercourse with a person, to wit, Jane Doe, not his spouse, against said person's will, by means of force, violence, duress, menace and fear of immediate and unlawful bodily injury on said person and another.

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

It is further alleged pursuant to **Penal Code section 186.22(b)(1)(C)** as to count 7 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members. Said act also caused the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(28).

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 186.30(a). Willful failure to register is a crime."

"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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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.

Pursuant to Evidence Code Sections 1101 and 1108, the People are notifying that they plan on introducing evidence of additional evidence of other sexual offenses at defendants' trial.

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 7 COUNTS.

Executed at Rancho Cucamonga, California, on February 23, 2021.

F. Ramos

F. Ramos
DECLARANT AND COMPLAINANT

Agency: Ontario Police Department

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Barnard Lamar Saddler	04/30/1997		A31543554	
Kenneth Earl Watson Jr	04/13/1978		A21535995	

Gang