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

THE PEOPLE OF THE STATE OF CALI	FORNIA, )
Plai	ntiff )
Vs.  Julio Cesar Villalta Maravilla , Isaac Anthony Guerra , aka Issac Guerra, aka Isaac Guerra, Anthony Roger Andrade	) ) FELONY COMPLAINT ) ) DA CASE NO 2021-00-0012600
Defe	endant )

The undersigned is informed and believes that:

## COUNT 1

On or about March 12, 2021, in the above named judicial district, the crime of DRIVING OR TAKING A VEHICLE WITHOUT CONSENT, in violation of VEHICLE CODE SECTION 10851(a), a felony, was committed by Isaac Anthony Guerra and Anthony Roger Andrade, who did drive a vehicle, to wit: 2016 Ford Transit T150 1FTYE2CM7GKA15768, without the consent of the owner, Majid Reza Motlagh, and with the intent to deprive the owner of title and possession of the vehicle.

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## **COUNT 2**

On or about March 12, 2021, in the above named judicial district, the crime of RECEIVING A STOLEN VEHICLE, TRAILER, CONSTRUCTION EQUIPMENT, OR VESSEL, in violation of PENAL CODE SECTION 496d, a felony, was committed by Isaac Anthony Guerra and Anthony Roger Andrade, who did unlawfully buy and receive a motor vehicle, specifically, 2016 Ford Transit T150, that had been stolen and that had been obtained in a manner constituting theft and extortion, knowing the property to be so stolen and obtained.

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## **COUNT 3**

On or about March 12, 2021, in the above named judicial district, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a felony, was committed by Julio Cesar Villalta Maravilla, Isaac Anthony Guerra and Anthony Roger Andrade, who did unlawfully steal, take, carry, lead, and drive away the personal property of State of California, specifically, Catalytic Converters, which had a value exceeding nine hundred fifty dollars (\$950).

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### **COUNT 4**

On or about March 12, 2021, in the above named judicial district, the crime of RECEIVING STOLEN PROPERTY EXCEEDING \$950 IN VALUE, in violation of PENAL CODE SECTION 496(a), a felony, was committed by Julio Cesar Villalta Maravilla, Isaac Anthony Guerra and Anthony Roger Andrade, who did unlawfully buy and receive property, exceeding nine hundred fifty dollars (\$950) in value, that had been stolen and that had been obtained in a manner constituting theft and extortion, specifically, Catalytic Converters, knowing the property to be so stolen and obtained.

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It is further alleged pursuant to Penal Code sections 1170.12(a) through (d) and 667(b) through (i) as to count(s) 1, 2, 3, 4 that said defendant(s) Isaac Anthony Guerra, has suffered the following prior conviction of a serious or violent felony or juvenile adjudication:

Court Case Code/Statute Conv Date County State Court Type FSB18001044 PC 245A1 08/20/2019 San Bernardino CA Municipal

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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.

### 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 4 COUNT(S).

Executed at San Bernardino, California, on March 16, 2021.

BHouser
BHOUSER
DECLARANT AND COMPLAINANT

Agency: San Bernardino Police Department		Prelim Est. 00:00		
Defendant Julio Cesar Villalta Maravilla Isaac Anthony Guerra	Birth Date 09/25/1993 08/04/1996	Booking No. 2103300488 2103300487	CII No. A39607726 A32592241	NCIC
Anthony Roger Andrade	05/24/1993	2103300490	A32615882	