

secured by the laws and Constitution of California and the United States because of the victim's status and perceived status as race or ethnicity.

It is further alleged that the crime included the present ability to commit a violent injury and caused actual physical injury

COUNT 3

On or about April 4, 2021, in the above named judicial district, the crime of BATTERY, in violation of PENAL CODE SECTION 242, a misdemeanor, was committed by Terrell Antonio Plaines, who did willfully and unlawfully use force and violence upon the person of Angel Perez .

It is further alleged pursuant to Penal Code Section 422.7as to count(s) 3, 4 that the offense is a felony in that it was committed against the person and property of victim Tingting Shan for the purpose of intimidating and interfering with the victim's free exercise and enjoyment of a right secured by the laws and Constitution of California and the United States because of the victim's status and perceived status as race or ethnicity.

It is further alleged that the crime included the present ability to commit a violent injury and caused actual physical injury

COUNT 4

On or about April 4, 2021, in the above named judicial district, the crime of BATTERY, in violation of PENAL CODE SECTION 242, a misdemeanor, was committed by Terrell Antonio Plaines, who did willfully and unlawfully use force and violence upon the person of Tingting Shan .

It is further alleged pursuant to Penal Code Section 422.7as to count(s) 3, 4 that the offense is a felony in that it was committed against the person and property of victim Tingting Shan for the purpose of intimidating and interfering with the victim's free exercise and enjoyment of a right secured by the laws and Constitution of California and the United States because of the victim's status and perceived status as race or ethnicity.

It is further alleged that the crime included the present ability to commit a violent injury and caused actual physical injury

COUNT 5

On or about April 4, 2021, in the above named judicial district, the crime of BATTERY, in violation of PENAL CODE SECTION 242, a misdemeanor, was committed by Tuvorius Arney Mencer, who did willfully and unlawfully use force and violence upon the person of Johnny Del Rio .

COUNT 6

On or about April 4, 2021, in the above named judicial district, the crime of BATTERY WITH INJURY ON A PEACE OFFICER, in violation of PENAL CODE SECTION 243(c)(2), a felony, was committed by Tuvorius Arney Mencer, who did unlawfully use force and violence and inflict an injury upon the person of Angel Perez when said defendant(s) Tuvorius Arney Mencer knew and reasonably should have known that said person was a peace officer then and there engaged in the performance of duty.

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

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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 6 COUNT(S).

Executed at Rancho Cucamonga, California, on April 6, 2021.

A. Bullock

A. Bullock

DECLARANT AND COMPLAINANT

Agency: Ontario Police Department

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Tuvorius Arney Mencer	09/30/1986	2104340367	A39641774	
Terrell Antonio Plaines	10/01/1989		A38915898	