

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
RANCHO CUCAMONGA DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)	
)	
Plaintiff)	
)	
vs.)	
)	
Jacob Allen Wright)	FELONY COMPLAINT
)	
)	
Defendant)	DA CASE NO 2021-00-0017085

The undersigned is informed and believes that:

COUNT 1

On or about March 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 Jacob Allen Wright, who did unlawfully, and with malice aforethought murder Jia Jia, 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, 2, 3, 4 that in the commission and attempted commission of the above offense, the said defendant(s) Jacob Allen Wright, personally used a deadly and dangerous weapon(s), to wit, Knife, said use not being an element of the above offense, within the meaning of Penal Code Section 12022(b)(1) and causing the above offense to be a serious felony within the meaning of Penal Code section 1192.7(c)(23).

It is further alleged as to count(s) 1, 2 that the offenses charged in counts 1 and 2 are a special circumstance within the meaning of Penal Code Section 190.2(a)(3).

It is further alleged as to count(s) 1, 2 that the murder of Jia Jia was committed by defendant(s) Jacob Allen Wright while the said defendant(s) was/were engaged in the commission

of the crime of burglary in the first and second degree in violation of Section 460, within the meaning of Penal Code section 190.2(a)(17)(G).

COUNT 2

On or about March 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 Jacob Allen Wright, who did unlawfully, and with malice aforethought murder Jane Doe, 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, 2, 3, 4 that in the commission and attempted commission of the above offense, the said defendant(s) Jacob Allen Wright, personally used a deadly and dangerous weapon(s), to wit, Knife, said use not being an element of the above offense, within the meaning of Penal Code Section 12022(b)(1) and causing the above offense to be a serious felony within the meaning of Penal Code section 1192.7(c)(23).

It is further alleged as to count(s) 1, 2 that the offenses charged in counts 1 and 2 are a special circumstance within the meaning of Penal Code Section 190.2(a)(3).

It is further alleged as to count(s) 1, 2 that the murder of Jia Jia was committed by defendant(s) Jacob Allen Wright while the said defendant(s) was/were engaged in the commission of the crime of burglary in the first and second degree in violation of Section 460, within the meaning of Penal Code section 190.2(a)(17)(G).

COUNT 3

On or about March 7, 2021, in the above named judicial district, the crime of ATTEMPTED WILLFUL, DELIBERATE, AND PREMEDITATED ATTEMPTED MURDER, in violation of PENAL

CODE SECTION 664/187(a), a felony, was committed by Jacob Allen Wright, who did unlawfully and with malice aforethought attempt to murder Zhu Zhu , a human being.

It is further alleged that the aforesaid attempted murder was committed willfully, deliberately and with premeditation within the meaning of Penal Code section 664(a).

"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, 2, 3, 4 that in the commission and attempted commission of the above offense, the said defendant(s) Jacob Allen Wright, personally used a deadly and dangerous weapon(s), to wit, Knife, said use not being an element of the above offense, within the meaning of Penal Code Section 12022(b)(1) and causing the above offense to be a serious felony within the meaning of Penal Code section 1192.7(c)(23).

COUNT 4

On or about March 7, 2021, in the above named judicial district, the crime of FIRST DEGREE BURGLARY, PERSON PRESENT, in violation of PENAL CODE SECTION 459, a felony, was committed by Jacob Allen Wright, who did enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by Jia Jia, with the intent to commit larceny and any felony.

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

It is further alleged that the above offense is a violation of Penal Code Section 462(a).

It is further alleged that the above offense is a violent felony within the meaning of Penal Code 667.5(c) in that another person, other than an accomplice, was present in the residence during the commission of the above offense.

It is further alleged as to count(s) 1, 2, 3, 4 that in the commission and attempted commission of the above offense, the said defendant(s) Jacob Allen Wright, personally used a deadly and dangerous weapon(s), to wit, Knife, said use not being an element of the above offense, within the meaning of Penal Code Section 12022(b)(1) and causing the above offense to be a serious felony within the meaning of Penal Code section 1192.7(c)(23).

* * * * *

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 Rancho Cucamonga, California, on April 15, 2021.

S. Truesdell

S. Truesdell

DECLARANT AND COMPLAINANT

Agency: Rancho Cucamonga Police Dept

Prelim Est. 00:00

Defendant
Jacob Allen Wright

Birth Date
12/13/2001

Booking No.
2104300544

CII No.
A39657250

NCIC