

"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 May 1, 2021, in the above named judicial district, the crime of SHOOTING AT AN INHABITED DWELLING/OCCUPIED MOTOR VEHICLE/OCCUPIED AIRCRAFT/ETC, in violation of PENAL CODE SECTION 246, a felony, was committed by Tyrese Williams Lawrence, who did willfully, unlawfully, and maliciously discharge a firearm at an inhabited dwelling house.

"NOTICE: It is further alleged that, pursuant to Penal Code section 1203.095, there is a presumptive minimal jail time required if you are convicted of this charge."

"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)(C) as to count 2, 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 3

On or about May 1, 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 Tyrese Williams Lawrence, who did enter an inhabited dwelling house and trailer

coach and inhabited portion of a building occupied by Calvin Martinez , 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 pursuant to Penal Code section 186.22(b)(1) as to count 3 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 4

On or about May 1, 2021, in the above named judicial district, the crime of ASSAULT WITH A FIREARM-PERSONAL USE OF FIREARM, in violation of PENAL CODE SECTION 245(a)(2), a felony, was committed by Garyeon Land, who did willfully and unlawfully commit an assault on Calvin Martinez with a firearm.

"NOTICE: It is further alleged that, pursuant to Penal Code section 1203.095, there is a presumptive minimal jail time required if you are convicted of this charge."

"NOTICE: This offense is a serious felony and a violent felony within the meaning of Penal Code sections 1192.7(c)(8) and 667.5(c)(8)."

It is further alleged that the defendant(s) Garyeon Land personally used a firearm, to wit, a Handgun within the meaning of Penal Code sections 12022.5, 1192.7(c) and 667.5(c).

It is further alleged pursuant to Penal Code section 186.22(b)(1) as to count 4 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 5

On or about May 1, 2021, in the above named judicial district, the crime of ACCESSORY AFTER THE FACT-(KNOWLEDGE OF CRIME), in violation of PENAL CODE SECTION 32, a felony, was committed by Garyeon Land, who unlawfully, having knowledge that the crime of murder/assault with a firearm, a felony, in violation of Section 187 and/or 245(a)(2) of the Penal Code of the State of California had been committed by Tyrese Lawrence, did harbor, conceal, and aid said Tyrese Lawrence, with the intent that he/she might avoid and escape from arrest, trial, conviction, and punishment for said felony.

It is further alleged pursuant to Penal Code section 186.22(b)(1) 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 May 1, 2021, 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 Tyrese Williams Lawrence and Garyeon Land, 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.

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, 6 that said defendant(s) Tyrese Williams Lawrence, 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
NA11085601	PC211	05/21/2019	Los Angeles	CA	Superior
FVI19001489	PC211	04/27/2020	San Bernardino	CA	Superior

It is further alleged as to count(s) 1, 2, 3, 6 pursuant to Penal Code section 667(a)(1) that the defendant(s) Tyrese Williams Lawrence, has suffered the following prior conviction(s) of a serious felony:

Court Case	Code/Statute	Conv Date	County	State	Court Type
NA11085601	PC211	05/21/2019	Los Angeles	CA	Superior
FVI19001489	PC211	04/27/2020	San Bernardino	CA	Superior

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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 Victorville, California, on May 4, 2021.

Britt P. Imes

Britt P. Imes

DECLARANT AND COMPLAINANT

Agency: Victor Valley Sheriff Station

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Tyrese Williams Lawrence	08/27/2000		A35140361	
Garyeon Land	06/02/2000	2105370035	A39689371	

Gang