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

THE PEOPLE OF THE STATE OF CALIFORNIA,			
Plaintiff)) FIF		
)) AM		
vs. Angel Rojas (FWV21004148)			
Anger Rojas (FWV21004140)			

Defendant

FIRST

AMENDED

Felony COMPLAINT

DA CASE NO 2021-00-0048528

The undersigned is informed and believes that:

COUNT 1

On or about October 31, 2021, in the above named judicial district, the crime of ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY, in violation of PENAL CODE SECTION 245(a)(4), a felony, was committed by Angel Rojas, committed an assault on the person of Jennifer M. by means of force likely to produce great bodily injury.

COUNT 2

On or about October 31, 2021, in the above named judicial district, the crime of ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY, in violation of PENAL CODE SECTION 245(a)(4), a felony, was committed by Angel Rojas, committed an assault on the person of Kayla O. by means of force likely to produce great bodily injury.

COUNT 3

On or about October 31, 2021, in the above named judicial district, the crime of ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY, in violation of PENAL CODE SECTION 245(a)(4), a felony, was committed by Angel Rojas, committed an assault on the person of Stephanie R. by means of force likely to produce great bodily injury.

COUNT 4

On or about October 31, 2021, in the above named judicial district, the crime of ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY, in violation of PENAL CODE SECTION 245(a)(4), a felony, was committed by Angel Rojas, committed an assault on the person of Kimberly R. by means of force likely to produce great bodily injury.

COUNT 5

On or about October 31, 2021, in the above named judicial district, the crime of DISSUADING A WITNESS BY FORCE OR THREAT, in violation of PENAL CODE SECTION 136.1(c)(1), a felony, was committed by Angel Rojas, did knowingly and maliciously do an act described in subdivisions (a) and (b) and such act was accompanied by force and an express and implied threat of force and violence upon Kayla O. and a third person and the property of a victim, witness and third person.

NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)(37).

COUNT 6

On or about October 31, 2021, in the above named judicial district, the crime of DISSUADING A WITNESS BY FORCE OR THREAT, in violation of PENAL CODE SECTION 136.1(c)(1), a felony, was committed by Angel Rojas, did knowingly and maliciously do an act described in subdivisions (a) and (b) and such act was accompanied by force and an express and implied threat of force and violence upon Stephanie R. and a third person and the property of a victim, witness and third person.

NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)(37).

COUNT 7

On or about October 31, 2021, in the above named judicial district, the crime of ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY, in violation of PENAL CODE SECTION 245(a)(4), a felony, was committed by Angel Rojas, committed an assault on the person of Kayla O. by means of force likely to produce great bodily injury.

COUNT 8

On or about October 31, 2021, in the above named judicial district, the crime of ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY, in violation of PENAL CODE SECTION 245(a)(4), a felony, was committed by Angel Rojas, committed an assault on the person of Stephanie R. by means of force likely to produce great bodily injury.

COUNT 9

On or about October 31, 2021, in the above named judicial district, the crime of SECOND DEGREE ROBBERY, in violation of PENAL CODE SECTION 211, a felony, was committed by Angel Rojas, did unlawfully, and by means of force and fear take personal property from the person, possession, and immediate presence of Stephanie R.

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. 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 9 COUNT(S).

Executed at Rancho Cucamonga, California, on November 17, 2021.

A. Bullock A. Bullock DECLARANT AND COMPLAINANT

<u>Agency</u> : Ontario Police Departm	ent		<u>Prelim E</u>	<u>Est.</u>		
Defendant Angel Rojas	Birth Date 1995-11-30	Booking No		CII No. A30493117	NCI	С