

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)	
)	
Plaintiff)	
)	
vs.)	FELONY COMPLAINT
)	
Ryan Cavender Wicks)	
)	
)	DA CASE NO 2022-00-0022805
)	
Defendant)	
)	
)	
)	

The undersigned is informed and believes that:

COUNT 1

On or about March 31, 2022, in the above-named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Ryan Cavender Wicks, who did unlawfully, and with malice aforethought murder Gary Boeldt II, 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).

COUNT 2

On or about March 31, 2022, in the above-named judicial district, the crime of DRIVING UNDER THE INFLUENCE OF AN ALCOHOLIC BEVERAGE CAUSING INJURY, in violation of VEHICLE CODE SECTION 23153(a), a felony, was committed by Ryan Cavender Wicks, who drove a vehicle while under the influence of an alcoholic beverage and concurrently acted illegally and/or negligently in driving the vehicle, thus causing bodily injury to Christine Lynn Carroll.

* * * * *

It is further alleged as to each count, pursuant to Penal Code section 1170, subdivision (b)(2), that the following circumstances may apply in this case:

1. The crime involved great violence, great bodily harm, threat of great bodily harm, or other acts disclosing a high degree of cruelty, viciousness, or callousness;
2. The victim was particularly vulnerable;
3. The defendant was convicted of other crimes for which consecutive sentences could have been imposed but for which concurrent sentences are being imposed;
4. The crime involved an attempted or actual taking or damage of great monetary value;
5. The defendant has engaged in violent conduct that indicates a serious danger to society;
6. The defendant's prior convictions as an adult or sustained petitions in juvenile delinquency proceedings are numerous or of increasing seriousness;
7. And any other aggravating factors that may be permitted by law.

* * * * *

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 2 COUNT(S).

Executed at San Bernardino, California, on April 04, 2022

Adam Pierce

Adam Pierce
DECLARANT AND COMPLAINANT

Agency: Rancho Cucamonga CHP

Prelim Est.

Defendant	Birth Date	Booking No	CII No.	NCIC
Ryan Cavender Wicks	1982-11-27	22003342852		