

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO  
VICTORVILLE DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,	)	
	)	
Plaintiff	)	
	)	
vs.	)	FELONY COMPLAINT
	)	
Edgar Ivan Galindo Diaz	)	
	)	
	)	DA CASE NO 2022-00-0035853
Defendant	)	
	)	
	)	
	)	

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The undersigned is informed and believes that:

COUNT 1

On or about July 02, 2022, in the above-named judicial district, the crime of VEHICULAR MANSLAUGHTER WITH GROSS NEGLIGENCE, in violation of PENAL CODE SECTION 192(c)(1), a felony, was committed by Edgar Ivan Galindo Diaz, who did unlawfully, and without malice, kill Jacob M., a human being, while driving a vehicle in the commission of an unlawful act, not amounting to a felony, and with gross negligence; and while driving a vehicle in the commission of a lawful act which might have produced death, in an unlawful manner, and with gross negligence. NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and 1192.8(a).

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COUNT 2

On or about July 02, 2022, in the above-named judicial district, the crime of VEHICULAR MANSLAUGHTER WITH GROSS NEGLIGENCE, in violation of PENAL CODE SECTION 192(c)(1), a felony, was committed by Edgar Ivan Galindo Diaz, who did unlawfully, and without malice, kill Christina B., a human being, while driving a vehicle in the commission of an unlawful act, not amounting to a felony, and with gross negligence; and while driving a vehicle in the commission of a lawful act which might have produced death, in an unlawful manner, and with gross negligence.

NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and 1192.8(a).

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COUNT 3

On or about July 02, 2022, in the above-named judicial district, the crime of HIT AND RUN DRIVING RESULTING IN DEATH OR SERIOUS INJURY TO ANOTHER PERSON, in violation of VEHICLE CODE SECTION 20001(b)(2), a felony, was committed by Edgar Ivan Galindo Diaz, who was driving a vehicle involved in an accident resulting in death to Jacob M. and failed to immediately stop and give his name to the person struck and to a traffic or police officer at the scene of the accident, and/or further failed to provide reasonable assistance to a person injured in the accident.

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COUNT 4

On or about July 02, 2022, in the above-named judicial district, the crime of HIT AND RUN DRIVING RESULTING IN DEATH OR SERIOUS INJURY TO ANOTHER PERSON, in violation of VEHICLE CODE SECTION 20001(b)(2), a felony, was committed by Edgar Ivan Galindo Diaz, who was driving a vehicle involved in an accident resulting in death to Christina B. and failed to immediately stop and give his name to the person struck and to a traffic or police officer at the scene of the accident, and/or further failed to provide reasonable assistance to a person injured in the accident.

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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 manner in which the crime was carried out indicates planning, sophistication, or professionalism;
4. 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 4 COUNT(S).

Executed at Victorville, California, on July 14, 2022

Justin J. Crocker  
Justin J. Crocker  
DECLARANT AND COMPLAINANT

Agency: Victorville CHP

Prelim Est.

Defendant	Birth Date	Booking No	CII No.	NCIC
Edgar Ivan Galindo Diaz	1987-02-26	2207370376		