

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)
)
 Plaintiff)
)
 vs.) FELONY COMPLAINT
)
 Nicholas Dane Campbell)
 aka Nicholas Dan Campbell)
 aka Nicholas Campbell) DA CASE NO 2022-00-0036484
 aka Nicholas Diane Campbell)
 aka Nicholas Dane Campbell)
)
)
 Defendant)
)
)
)

The undersigned is informed and believes that:

COUNT 1

On or about July 17, 2022, in the above-named judicial district, the crime of ATTEMPTED WILLFUL, DELIBERATE, PREMEDITATED MURDER OF A PEACE OFFICER in violation of PENAL CODE SECTION 664/187(a), a felony, was committed by Nicholas Dane Campbell, who did unlawfully attempt to murder Marcus Mason, who was a peace officer engaged in the performance of duty and this was known, and reasonably should have been known, by the defendant(s) .

It is further alleged, within the meaning of Penal Code Section 664(e) and (f), that the above offense was willful, deliberate and premeditated.

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 that said defendant(s) Nicholas Dane Campbell personally and intentionally discharged a firearm, a handgun, which proximately caused great bodily injury and death to Marcus Mason within the meaning of Penal Code section 12022.53(d).

It is further alleged as to count(s) 1 that said defendant(s) Nicholas Dane Campbell personally and intentionally discharged a firearm, a handgun, within the meaning of Penal Code section 12022.53(c).

It is further alleged as to count(s) 1 that said defendant(s) Nicholas Dane Campbell personally used a firearm, a handgun, within the meaning of Penal Code section 12022.53(b).

It is further alleged as to count(s) 1 that in the commission and attempted commission of the above offense, the defendant(s) Nicholas Dane Campbell, personally inflicted great bodily injury upon Marcus Mason, not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a).

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 pursuant to Penal Code section 1170(h)(3) defendant(s) Nicholas Dane Campbell is eligible for imprisonment in the state prison due to:

- the current charge is a serious or violent felony;
- defendant(s) Nicholas Dane Campbell has a prior serious or violent felony conviction;
- the crime is not punishable pursuant to Penal Code section 1170(h)(3).

COUNT 2

On or about July 17, 2022, in the above-named judicial district, the crime of POSSESSION OF FIREARM BY A FELON, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by Nicholas Dane Campbell, who did unlawfully own, purchase, receive, possess, and have custody and control of a firearm, to wit, Handgun, the said defendant(s) having been convicted

of a felony under the laws of the United States, the state of California and any other state, government and county:

Court Case	Code/Statute	Conv Date	County	State	Court Type
F05902149-4	PC459	2005-11-21	Fresno	CA	Superior
MCR022274	PC496(A)	2005-10-04	Madera	CA	Superior
MCR025737	PC484G	2006-09-11	Madera	CA	Superior
F07905338	VC10851	2007-08-29	Fresno	CA	Superior
MCR037901	VC10851	2011-05-05	Madera	CA	Superior
MCR039179	PC4532(B)	2011-05-05	Madera	CA	Superior
MCR041107D	PC245(A)(1) + PC186.22	2011-09-16	Madera	CA	Superior
XSWYA09645701	PC664/215	2018-02-05	Los Angeles	CA	Superior
F17902610	VC10851	2018-08-22	Fresno	CA	Superior

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Nicholas Dane Campbell is eligible for imprisonment in the state prison due to:

defendant(s) Nicholas Dane Campbell has a prior serious or violent felony conviction; the crime is not punishable pursuant to Penal Code section 1170(h)(3).

COUNT 3

On or about July 17, 2022, in the above-named judicial district, the crime of HAVING A CONCEALED FIREARM ON THE PERSON-NOT REGISTERED, in violation of PENAL CODE SECTION 25400(a)(2), a felony, was committed by Nicholas Dane Campbell, who did unlawfully carry concealed upon the person a pistol, revolver and firearm capable of being concealed upon the person.

It is further alleged, pursuant to Penal Code section 25400(c)(6), that the firearm and unexpanded ammunition were in the immediate possession of, and readily accessible to, the defendant and that the firearm was not registered to the defendant .

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Nicholas Dane Campbell is eligible for imprisonment in the state prison due to:

defendant(s) Nicholas Dane Campbell has a prior serious or violent felony conviction;

COUNT 4

On or about July 17, 2022, in the above-named judicial district, the crime of CARRYING LOADED HANDGUN ON ONE'S PERSON OR IN A VEHICLE-NOT REGISTERED, in violation of PENAL CODE SECTION 25850(a), a felony, was committed by Nicholas Dane Campbell, who did unlawfully carry a loaded handgun on the person and in a vehicle while in a public place and on a public street in an incorporated city and in a prohibited area of unincorporated territory.

It is further alleged, pursuant to Penal Code section 25850(c)(6) that said handgun was not registered to the defendant .

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Nicholas Dane Campbell is eligible for imprisonment in the state prison due to:

defendant(s) Nicholas Dane Campbell has a prior serious or violent felony conviction;

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, 4 that said Nicholas Dane Campbell, 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
MCR041107D	PC245(A)(1) + PC186.22	2011-09-16	Madera	CA	Superior
XSWYA09645701	PC664/215	2018-02-05	Los Angeles	CA	Superior

* * * * *

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 defendant was armed with or used a weapon at the time of the commission of the crime;
3. The victim was particularly vulnerable;
4. The defendant was convicted of other crimes for which consecutive sentences could have been imposed but for which concurrent sentences are being imposed;
5. The manner in which the crime was carried out indicates planning, sophistication, or professionalism;
6. The defendant took advantage of a position of trust or confidence to commit the offense.
7. The defendant has engaged in violent conduct that indicates a serious danger to society;
8. The defendant's prior convictions as an adult or sustained petitions in juvenile delinquency proceedings are numerous or of increasing seriousness;
9. The defendant has served a prior term in prison or county jail under section 1170(h);
10. The defendant was on probation, mandatory supervision, postrelease community supervision, or parole when the crime was committed; and
11. The defendant's prior performance on probation, mandatory supervision, postrelease community supervision, or parole was unsatisfactory; and
12. 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 Rancho Cucamonga, California, on July 19, 2022

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DECLARANT AND COMPLAINANT

Agency: Rancho Cucamonga Police Dept

Prelim Est.

Defendant	Birth Date	Booking No	CII No.	NCIC
Nicholas Dane Campbell	1987-01-04	2207341385	A23892202	