

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
CENTRAL DIVISION**

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

v.

JUSTIN ANTONIO ANDERSON,
dob 01/13/88
aka JUSTIN ANDERSON;

ALVIN RANDOLPH BANKS,
dob 04/01/88;

DARRYL LAWRENCE CHARLES JR.,
dob 05/13/86
aka DARRYL LAWRENCE CHARLES;

DESMOND RAYSHAWN CRISP,
dob 10/27/93;

BRANDON DUNCAN,
dob 12/18/81;

GLENN ROY GRAY,
dob 02/07/82;

AARON WAYNE HARVEY,
dob 06/13/88;

JAWAUN DESHAY JONES,
dob 05/19/85;

CEDRIC CHARLES JORDAN,
dob 12/04/87;

BUKSTANLEY BERNARD KING JR.,
dob 08/20/85
aka STANLEY BERNARD KING;

FRANKLIN LAMBERTH III,
dob 05/22/77
aka FRANKLIN ROOSEVELT LAMBERTH;

AMENDED
COMPLAINT-FELONY

INFORMATION

Date: _____

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

v.

ANTHONY ROBINSON,
dob 05/12/87
aka ANTHONY ROBINSON, JR.;

TEVONTE STRIPLING,
dob 08/29/94
aka TEVONTE DARNELL STRIPLING;

BYREESE TAYLOR,
dob 10/06/93
aka BYREESE D. TAYLOR;

DEON WINTERS,
dob 06/23/88
aka DEON DENNELL WINTERS;

Defendants

PC296 DNA TEST STATUS SUMMARY

Defendant	DNA Testing Requirements
ANDERSON, JUSTIN	DNA sample has been previously provided
BANKS, ALVIN RANDOLPH	DNA sample required upon conviction
CHARLES, JR., DARRYL LAWRENCE	DNA sample has been previously provided
CRISP, DESMOND RAYSHAWN	DNA sample has been previously provided
DUNCAN, BRANDON	DNA sample required upon conviction
GRAY, GLENN ROY	DNA sample has been previously provided
HARVEY, AARON WAYNE	DNA sample has been previously provided
JONES, JAWAUN DESHAY	DNA sample has been previously provided
JORDAN, CEDRIC CHARLES	DNA sample has been previously provided
KING, JR., STANLEY BERNARD	DNA sample has been previously provided
LAMBERTH, III, FRANKLIN	DNA sample has been previously provided
ROBINSON, ANTHONY	DNA sample has been previously provided
STRIPLING, TEVONTE	DNA sample has been previously provided
TAYLOR, BYREESE	DNA sample has been previously provided
WINTERS, DEON	DNA sample has been previously provided

CHARGE SUMMARY

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
1	PC182(a)(1)	Felony	Check Code		
	ANDERSON, JUSTIN			PC186.22(b)(1)	Check Code
	CRISP, DESMOND RAYSHAWN			PC186.22(b)(1)	Check Code
	KING, JR., STANLEY BERNARD			PC186.22(b)(1)	Check Code
2	PC182.5	Felony	Check Code		
	ANDERSON, JUSTIN				
	BANKS, ALVIN RANDOLPH				
	CHARLES, JR., DARRYL LAWRENCE				
	CRISP, DESMOND RAYSHAWN				
	DUNCAN, BRANDON				
	GRAY, GLENN ROY				
	HARVEY, AARON WAYNE				
	JONES, JAWAUN DESHAY				
	JORDAN, CEDRIC CHARLES				
	KING, JR., STANLEY BERNARD				
	LAMBERTH, III, FRANKLIN				
	ROBINSON, ANTHONY				
	STRIPLING, TEVONTE				
	WINTERS, DEON				
3	PC182.5	Felony	Check Code		
	ANDERSON, JUSTIN				
	BANKS, ALVIN RANDOLPH				
	CHARLES, JR., DARRYL LAWRENCE				
	CRISP, DESMOND RAYSHAWN				
	DUNCAN, BRANDON				
	GRAY, GLENN ROY				
	HARVEY, AARON WAYNE				
	JONES, JAWAUN DESHAY				
	JORDAN, CEDRIC CHARLES				

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
3	PC182.5 KING, JR., STANLEY BERNARD LAMBERTH, III, FRANKLIN ROBINSON, ANTHONY STRIPLING, TEVONTE WINTERS, DEON	Felony	Check Code		
4	PC182.5 ANDERSON, JUSTIN BANKS, ALVIN RANDOLPH CHARLES, JR., DARRYL LAWRENCE CRISP, DESMOND RAYSHAWN DUNCAN, BRANDON GRAY, GLENN ROY HARVEY, AARON WAYNE JONES, JAWAUN DESHAY JORDAN, CEDRIC CHARLES KING, JR., STANLEY BERNARD LAMBERTH, III, FRANKLIN ROBINSON, ANTHONY STRIPLING, TEVONTE WINTERS, DEON	Felony	Check Code		
5	PC664\PC187(a) STRIPLING, TEVONTE	Felony	5-7-9	PC189 PC12022.53(c) & (e)(1) PC186.22(b)(1)	Life W Parole +20 Yrs Check Code
6	PC246 STRIPLING, TEVONTE	Felony	3-5-7	PC186.22(b)(1)	Check Code
7	PC182.5 ANDERSON, JUSTIN BANKS, ALVIN RANDOLPH	Felony	Check Code		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
7	PC182.5	Felony	Check Code		
	CHARLES, JR., DARRYL LAWRENCE				
	CRISP, DESMOND RAYSHAWN				
	DUNCAN, BRANDON				
	GRAY, GLENN ROY				
	HARVEY, AARON WAYNE				
	JONES, JAWAUN DESHAY				
	JORDAN, CEDRIC CHARLES				
	KING, JR., STANLEY BERNARD				
	LAMBERTH, III, FRANKLIN				
	ROBINSON, ANTHONY				
	STRIPLING, TEVONTE				
	WINTERS, DEON				
8	PC182(a)(1)	Felony	Check Code		
	CHARLES, JR., DARRYL LAWRENCE			PC186.22(b)(1)	Check Code
	GRAY, GLENN ROY			PC186.22(b)(1)	Check Code
	LAMBERTH, III, FRANKLIN			PC186.22(b)(1)	Check Code
9	PC182.5	Felony	Check Code		
	ANDERSON, JUSTIN				
	BANKS, ALVIN RANDOLPH				
	CHARLES, JR., DARRYL LAWRENCE				
	CRISP, DESMOND RAYSHAWN				
	DUNCAN, BRANDON				
	GRAY, GLENN ROY				
	HARVEY, AARON WAYNE				
	JONES, JAWAUN DESHAY				
	JORDAN, CEDRIC CHARLES				
	KING, JR., STANLEY BERNARD				
	LAMBERTH, III, FRANKLIN				

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
9	PC182.5 ROBINSON, ANTHONY STRIPLING, TEVONTE WINTERS, DEON	Felony	Check Code		
10	PC664\PC187(a) ANDERSON, JUSTIN	Felony	5-7-9	PC189 PC12022.53(c) & (e)(1) PC186.22(b)(1)	Life W Parole +20 Yrs Check Code
11	PC182.5 ANDERSON, JUSTIN BANKS, ALVIN RANDOLPH CHARLES, JR., DARRYL LAWRENCE CRISP, DESMOND RAYSHAWN DUNCAN, BRANDON GRAY, GLENN ROY HARVEY, AARON WAYNE JONES, JAWAUN DESHAY JORDAN, CEDRIC CHARLES KING, JR., STANLEY BERNARD LAMBERTH, III, FRANKLIN ROBINSON, ANTHONY STRIPLING, TEVONTE WINTERS, DEON	Felony	Check Code		
12	PC664\PC187(a) ANDERSON, JUSTIN	Felony	5-7-9	PC189 PC12022.53(c) & (e)(1) PC12022.53(d) & (e)(1) PC186.22(b)(1)	Life W Parole +20 Yrs +25 Yrs-Life Check Code
13	PC182.5 ANDERSON, JUSTIN BANKS, ALVIN RANDOLPH	Felony	Check Code		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
13	PC182.5	Felony	Check Code		
	CHARLES, JR., DARRYL LAWRENCE				
	CRISP, DESMOND RAYSHAWN				
	DUNCAN, BRANDON				
	GRAY, GLENN ROY				
	HARVEY, AARON WAYNE				
	JONES, JAWAUN DESHAY				
	JORDAN, CEDRIC CHARLES				
	KING, JR., STANLEY BERNARD				
	LAMBERTH, III, FRANKLIN				
	ROBINSON, ANTHONY				
	STRIPLING, TEVONTE				
	WINTERS, DEON				
14	PC182.5	Felony	Check Code		
	ANDERSON, JUSTIN				
	BANKS, ALVIN RANDOLPH				
	CHARLES, JR., DARRYL LAWRENCE				
	CRISP, DESMOND RAYSHAWN				
	DUNCAN, BRANDON				
	GRAY, GLENN ROY				
	HARVEY, AARON WAYNE				
	JONES, JAWAUN DESHAY				
	JORDAN, CEDRIC CHARLES				
	KING, JR., STANLEY BERNARD				
	LAMBERTH, III, FRANKLIN				
	ROBINSON, ANTHONY				
	STRIPLING, TEVONTE				
	TAYLOR, BYREESE				
	WINTERS, DEON				

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
15	PC664\PC187(a) TAYLOR, BYREESE	Felony	5-7-9	PC12022.53(c) PC186.22(b)(1)	+20 Yrs Check Code
16	PC182.5 ANDERSON, JUSTIN BANKS, ALVIN RANDOLPH CHARLES, JR., DARRYL LAWRENCE CRISP, DESMOND RAYSHAWN DUNCAN, BRANDON GRAY, GLENN ROY HARVEY, AARON WAYNE JONES, JAWAUN DESHAY JORDAN, CEDRIC CHARLES KING, JR., STANLEY BERNARD LAMBERTH, III, FRANKLIN ROBINSON, ANTHONY STRIPLING, TEVONTE TAYLOR, BYREESE WINTERS, DEON	Felony	Check Code		

PC1054.3

INFORMAL REQUEST FOR DISCOVERY

The undersigned, certifying upon information and belief, complains that in the County of San Diego, State of California, the Defendant(s) did commit the following crime(s):

CHARGES

COUNT 1 - CONSPIRACY TO COMMIT A CRIME

On or about April 27, 2013, JUSTIN ANTONIO ANDERSON, DESMOND RAYSHAWN CRISP, and STANLEY BERNARD KING JR. did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of First Degree Murder in violation of Penal Code sections 187/189; Assault with a Deadly weapon, to wit: a firearm in violation of Penal Code section 245(a)(2), in violation of PENAL CODE SECTION 182(a)(1).

The object of this conspiracy was to locate and shoot individuals the defendants believed to be rivals to the Lincoln Park street gang.

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

OVERT ACT NO.(01): On or about April 27, 2013, at approximately 10:40 p.m., during a telephone conversation, JUSTIN ANDERSON aka "J HAWG" asks to borrow a firearm from DARRYL CHARLES JR. aka "TINY BEEF."

OVERT ACT NO.(02): On or about April 27, 2013, during a telephone conversation, DARRYL CHARLES JR. aka "TINY BEEF" tells JUSTIN ANDERSON aka "J HAWG" that either DEON WINTERS aka "LIL KAL" or ALONZO HARVEY aka "BRIM HOUND" possesses the firearm.

OVERT ACT NO.(03): On or about April 27, 2013, at approximately 10:44 p.m., during a telephone conversation, DEON WINTERS aka "LIL KAL" tells JUSTIN ANDERSON aka "J HAWG" of the location of the firearm.

OVERT ACT NO.(04): On or about April 27, 2013, at approximately 10:55 p.m., during a telephone conversation, JUSTIN ANDERSON aka "J HAWG" asks DEON WINTERS aka "LIL KAL" if WINTERS knows the location of a second firearm.

OVERT ACT NO.(05): On or about April 27, 2013, at approximately 11:03 p.m., during a telephone conversation, JUSTIN ANDERSON aka "J HAWG" and DEON WINTERS aka "LIL KAL" discuss the location of a second firearm.

OVERT ACT NO.(06): On or about April 27, 2013, at approximately 11:06 p.m., during a telephone conversation, JUSTIN ANDERSON aka "J HAWG" asks to borrow a firearm from JAWAUN JONES aka "J BRIV."

OVERT ACT NO.(07): On or about April 27, 2013, at approximately 11:09 p.m., during a telephone conversation, JUSTIN ANDERSON aka "J HAWG" tells DEON WINTERS aka "LIL KAL" that ANDERSON is "trying to bust a move."

OVERT ACT NO.(08): On or about April 27, 2013, at approximately 11:38 p.m., during a telephone conversation, JUSTIN ANDERSON aka "J HAWG" and ALONZO HARVEY aka "BRIM HOUND" discuss the location of a firearm.

OVERT ACT NO.(09): On or about April 28, 2013, at approximately 12:46 a.m., during a telephone conversation, STANLEY KING aka "SK", while using the telephone of JUSTIN ANDERSON aka "J HAWG", tells DEON WINTERS aka "LIL KAL" that there are police officers near their location and they are "stuck on the block."

CHARGES (cont'd)

And it is further alleged that the defendant JUSTIN ANTONIO ANDERSON did commit the above felony offense 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 within the meaning of PENAL CODE SECTION 186.22(b)(1).

And it is further alleged that the defendant DESMOND RAYSHAWN CRISP did commit the above felony offense 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 within the meaning of PENAL CODE SECTION 186.22(b)(1).

And it is further alleged that the defendant STANLEY BERNARD KING JR. did commit the above felony offense 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 within the meaning of PENAL CODE SECTION 186.22(b)(1).

COUNT 2 - CRIMINAL STREET GANG - CONSPIRACY TO COMMIT FELONY

On or about May 28, 2013, JUSTIN ANTONIO ANDERSON, ALVIN RANDOLPH BANKS, DARRYL LAWRENCE CHARLES JR., DESMOND RAYSHAWN CRISP, BRANDON DUNCAN, GLENN ROY GRAY, AARON WAYNE HARVEY, JAWAUN DESHAY JONES, CEDRIC CHARLES JORDAN, STANLEY BERNARD KING JR., FRANKLIN LAMBERTH III, ANTHONY ROBINSON, TEVONTE STRIPLING, and DEON WINTERS committed the crime of Criminal Street Gang Conspiracy, in violation of Penal Code Section 182.5, a felony, by unlawfully and actively participating in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of criminal gang activity and did willfully promote, further, assist and benefit from felonious criminal conduct by members of that gang, to wit: the crimes of Premeditated Attempted Murder and Shooting at Inhabited Occupied Structure, in violation of Penal Code sections 664/187/189 and 246, committed on or about May 28, 2013, in violation of PENAL CODE SECTION 182.5.

COUNT 3 - CRIMINAL STREET GANG - CONSPIRACY TO COMMIT FELONY

On or about May 29, 2013, JUSTIN ANTONIO ANDERSON, ALVIN RANDOLPH BANKS, DARRYL LAWRENCE CHARLES JR., DESMOND RAYSHAWN CRISP, BRANDON DUNCAN, GLENN ROY GRAY, AARON WAYNE HARVEY, JAWAUN DESHAY JONES, CEDRIC CHARLES JORDAN, STANLEY BERNARD KING JR., FRANKLIN LAMBERTH III, ANTHONY ROBINSON, TEVONTE STRIPLING, and DEON WINTERS committed the crime of Criminal Street Gang Conspiracy, in violation of Penal Code Section 182.5, a felony, by unlawfully and actively participating in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of criminal gang activity and did willfully promote, further, assist and benefit from felonious criminal conduct by members of that gang, to wit: the crimes of Premeditated Attempted Murder and Shooting at Inhabited Occupied Structure, in violation of Penal Code sections 664/187/189 and 246, committed on or about May 29, 2013, in violation of PENAL CODE SECTION 182.5.

CHARGES (cont'd)

COUNT 4 - CRIMINAL STREET GANG - CONSPIRACY TO COMMIT FELONY

On or about June 4, 2013, JUSTIN ANTONIO ANDERSON, ALVIN RANDOLPH BANKS, DARRYL LAWRENCE CHARLES JR., DESMOND RAYSHAWN CRISP, BRANDON DUNCAN, GLENN ROY GRAY, AARON WAYNE HARVEY, JAWAUN DESHAY JONES, CEDRIC CHARLES JORDAN, STANLEY BERNARD KING JR., FRANKLIN LAMBERTH III, ANTHONY ROBINSON, TEVONTE STRIPLING, and DEON WINTERS committed the crime of Criminal Street Gang Conspiracy, in violation of Penal Code Section 182.5, a felony, by unlawfully and actively participating in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of criminal gang activity and did willfully promote, further, assist and benefit from felonious criminal conduct by members of that gang, to wit: the crimes of Premeditated Attempted Murder and Shooting at Inhabited Occupied Structure, in violation of Penal Code sections 664/187/189 and 246, committed on or about June 4, 2013, in violation of PENAL CODE SECTION 182.5.

COUNT 5 - ATTEMPT MURDER

On or about July 5, 2013, TEVONTE STRIPLING did unlawfully attempt to murder another, a human being, in violation of PENAL CODE SECTION 187(a) and PENAL CODE SECTION 664.

And it is further alleged that the above offense was willful, deliberate and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant, TEVONTE STRIPLING, was a principal in the foregoing offense, and in the commission of the offense at least one principal personally discharged a firearm, to wit: a semiautomatic handgun, within the meaning of PENAL CODE SECTION 12022.53(c) AND (e)(1).

And it is further alleged that the defendant TEVONTE STRIPLING did commit the above felony offense 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 within the meaning of PENAL CODE SECTION 186.22(b)(1).

COUNT 6 - SHOOTING AT INHABITED OCCUPIED STRUCTURES/VEHICLES/AIRCRAFT

On or about July 5, 2013, TEVONTE STRIPLING did maliciously, willfully, and unlawfully discharge a firearm at an occupied motor vehicle, in violation of PENAL CODE SECTION 246.

And it is further alleged that the defendant TEVONTE STRIPLING did commit the above felony offense 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 within the meaning of PENAL CODE SECTION 186.22(b)(1).

CHARGES (cont'd)

COUNT 7 - CRIMINAL STREET GANG - CONSPIRACY TO COMMIT FELONY

On or about July 5, 2013, JUSTIN ANTONIO ANDERSON, ALVIN RANDOLPH BANKS, DARRYL LAWRENCE CHARLES JR., DESMOND RAYSHAWN CRISP, BRANDON DUNCAN, GLENN ROY GRAY, AARON WAYNE HARVEY, JAWAUN DESHAY JONES, CEDRIC CHARLES JORDAN, STANLEY BERNARD KING JR., FRANKLIN LAMBERTH III, ANTHONY ROBINSON, TEVONTE STRIPLING, and DEON WINTERS committed the crime of Criminal Street Gang Conspiracy, in violation of Penal Code Section 182.5, a felony, by unlawfully and actively participating in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of criminal gang activity and did willfully promote, further, assist and benefit from felonious criminal conduct by members of that gang, to wit: the crimes of Premeditated Attempted Murder and Shooting at Inhabited Occupied Vehicle, in violation of Penal Code section 664/187/189 and 246, committed on or about July 5, 2013, in violation of PENAL CODE SECTION 182.5.

COUNT 8 - CONSPIRACY TO COMMIT A CRIME

On or about and between January 1, 2013 and July 12, 2013, DARRYL LAWRENCE CHARLES JR., GLENN ROY GRAY, and FRANKLIN LAMBERTH III did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of First Degree Murder, in violation of Penal Code sections 187/189, Assault with a Deadly weapon, to wit: a firearm in violation of Penal Code section 245(a)(2); Shooting at an Inhabited Occupied Structure in violation of Penal Code section 246, in violation of PENAL CODE SECTION 182(a)(1).

The object of this conspiracy was to shoot Lincoln Park street gang member PRIDE ERVING aka "LIL PRIDE."

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

OVERT ACT NO.(01): On or about July 12, 2013, FRANKLIN LAMBRETH III aka "YF" and GLENN ROY GRAY aka "LIL FATAL" obtained loaded firearms.

OVERT ACT NO.(02): On or about July 12, 2013, FRANKLIN LAMBRETH III aka "YF" and GLENN ROY GRAY aka "LIL FATAL" obtained two ski masks.

OVERT ACT NO.(03): On or about July 12, 2013, GLENN ROY GRAY aka "LIL FATAL" obtained a pair of baseball batting gloves.

OVERT ACT NO.(04): On or about July 12, 2013, FRANKLIN LAMBRETH III aka "YF" and GLENN ROY GRAY aka "LIL FATAL" drove to a location near the home of Lincoln Park street gang member PRIDE ERVING aka "LIL PRIDE."

OVERT ACT NO.(05): On or about July 12, 2013, FRANKLIN LAMBRETH III aka "YF" and GLENN ROY GRAY aka "LIL FATAL" parked across the street from the home of Lincoln Park street gang member PRIDE ERVING aka "LIL PRIDE."

OVERT ACT NO.(06): On or about July 12, 2013, FRANKLIN LAMBRETH III aka "YF" and GLENN ROY GRAY aka "LIL FATAL" each put on a black ski mask.

CHARGES (cont'd)

And it is further alleged that the defendant DARRYL LAWRENCE CHARLES JR. did commit the above felony offense 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 within the meaning of PENAL CODE SECTION 186.22(b)(1).

And it is further alleged that the defendant GLENN ROY GRAY did commit the above felony offense 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 within the meaning of PENAL CODE SECTION 186.22(b)(1).

And it is further alleged that the defendant FRANKLIN LAMBERTH III did commit the above felony offense 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 within the meaning of PENAL CODE SECTION 186.22(b)(1).

COUNT 9 - CRIMINAL STREET GANG - CONSPIRACY TO COMMIT FELONY

On or about July 27, 2013, JUSTIN ANTONIO ANDERSON, ALVIN RANDOLPH BANKS, DARRYL LAWRENCE CHARLES JR., DESMOND RAYSHAWN CRISP, BRANDON DUNCAN, GLENN ROY GRAY, AARON WAYNE HARVEY, JAWAUN DESHAY JONES, CEDRIC CHARLES JORDAN, STANLEY BERNARD KING JR., FRANKLIN LAMBERTH III, ANTHONY ROBINSON, TEVONTE STRIPLING, and DEON WINTERS committed the crime of Criminal Street Gang Conspiracy, in violation of Penal Code Section 182.5, a felony, by unlawfully and actively participating in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of criminal gang activity and did willfully promote, further, assist and benefit from felonious criminal conduct by members of that gang, to wit: the crimes of Premeditated Attempted Murder and Shooting at Inhabited Occupied Structure, in violation of Penal Code sections 664/187/189 and 246, committed on or about July 27, 2013, in violation of PENAL CODE SECTION 182.5.

COUNT 10 - ATTEMPT MURDER

On or about July 28, 2013, JUSTIN ANTONIO ANDERSON did unlawfully attempt to murder another, a human being, in violation of PENAL CODE SECTION 187(a) and PENAL CODE SECTION 664.

And it is further alleged that the above offense was willful, deliberate and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant, JUSTIN ANTONIO ANDERSON, was a principal in the foregoing offense, and in the commission of the offense at least one principal personally discharged a firearm, to wit: a semiautomatic handgun, within the meaning of PENAL CODE SECTION 12022.53(c) AND (e)(1).

CHARGES (cont'd)

And it is further alleged that the defendant JUSTIN ANTONIO ANDERSON did commit the above felony offense 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 within the meaning of PENAL CODE SECTION 186.22(b)(1).

COUNT 11 - CRIMINAL STREET GANG - CONSPIRACY TO COMMIT FELONY

On or about July 28, 2013, JUSTIN ANTONIO ANDERSON, ALVIN RANDOLPH BANKS, DARRYL LAWRENCE CHARLES JR., DESMOND RAYSHAWN CRISP, BRANDON DUNCAN, GLENN ROY GRAY, AARON WAYNE HARVEY, JAWAUN DESHAY JONES, CEDRIC CHARLES JORDAN, STANLEY BERNARD KING JR., FRANKLIN LAMBERTH III, ANTHONY ROBINSON, TEVONTE STRIPLING, and DEON WINTERS committed the crime of Criminal Street Gang Conspiracy, in violation of Penal Code Section 182.5, a felony, by unlawfully and actively participating in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of criminal gang activity and did willfully promote, further, assist and benefit from felonious criminal conduct by members of that gang, to wit: the crimes of Premeditated Attempted Murder and Shooting at Inhabited Occupied Structure, in violation of Penal Code sections 664/187/189 and 246, committed on or about July 28, 2013, in violation of PENAL CODE SECTION 182.5.

COUNT 12 - ATTEMPT MURDER

On or about August 4, 2013, JUSTIN ANTONIO ANDERSON did unlawfully attempt to murder another, a human being, in violation of PENAL CODE SECTION 187(a) and PENAL CODE SECTION 664.

And it is further alleged that the above offense was willful, deliberate and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant, JUSTIN ANTONIO ANDERSON, was a principal in the foregoing offense, and in the commission of the offense at least one principal personally discharged a firearm, to wit: a semiautomatic handgun, within the meaning of PENAL CODE SECTION 12022.53(c) AND (e)(1).

And it is further alleged that the defendant, JUSTIN ANTONIO ANDERSON, was a principal in the foregoing offense, and in the commission of the offense at least one principal personally used a firearm, to wit: a semiautomatic handgun, and proximately caused great bodily injury and death to a person (other than an accomplice), within the meaning of PENAL CODE SECTION 12022.53(d) AND (e)(1).

And it is further alleged that the defendant JUSTIN ANTONIO ANDERSON did commit the above felony offense 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 within the meaning of PENAL CODE SECTION 186.22(b)(1).

CHARGES (cont'd)

COUNT 13 - CRIMINAL STREET GANG - CONSPIRACY TO COMMIT FELONY

On or about August 4, 2013, JUSTIN ANTONIO ANDERSON, ALVIN RANDOLPH BANKS, DARRYL LAWRENCE CHARLES JR., DESMOND RAYSHAWN CRISP, BRANDON DUNCAN, GLENN ROY GRAY, AARON WAYNE HARVEY, JAWAUN DESHAY JONES, CEDRIC CHARLES JORDAN, STANLEY BERNARD KING JR., FRANKLIN LAMBERTH III, ANTHONY ROBINSON, TEVONTE STRIPLING, and DEON WINTERS committed the crime of Criminal Street Gang Conspiracy, in violation of Penal Code Section 182.5, a felony, by unlawfully and actively participating in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of criminal gang activity and did willfully promote, further, assist and benefit from felonious criminal conduct by members of that gang, to wit: the crimes of Premeditated Attempted Murder and and Shooting at Inhabited Occupied Vehicle, in violation of Penal Code sections 664/187/189 and 246, committed on or about August 4, 2013, in violation of PENAL CODE SECTION 182.5.

COUNT 14 - CRIMINAL STREET GANG - CONSPIRACY TO COMMIT FELONY

On or about September 3, 2013, JUSTIN ANTONIO ANDERSON, ALVIN RANDOLPH BANKS, DARRYL LAWRENCE CHARLES JR., DESMOND RAYSHAWN CRISP, BRANDON DUNCAN, GLENN ROY GRAY, AARON WAYNE HARVEY, JAWAUN DESHAY JONES, CEDRIC CHARLES JORDAN, STANLEY BERNARD KING JR., FRANKLIN LAMBERTH III, ANTHONY ROBINSON, TEVONTE STRIPLING, BYREESE TAYLOR, and DEON WINTERS committed the crime of Criminal Street Gang Conspiracy, in violation of Penal Code Section 182.5, a felony, by unlawfully and actively participating in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of criminal gang activity and did willfully promote, further, assist and benefit from felonious criminal conduct by members of that gang, to wit: the crimes of Premeditated Attempted Murder and and Shooting at Inhabited Occupied Structure, in violation of Penal Code sections 664/187/189 and 246, committed on or about September 3, 2013, in violation of PENAL CODE SECTION 182.5.

COUNT 15 - ATTEMPT MURDER

On or about February 12, 2014, BYREESE TAYLOR did unlawfully attempt to murder another, a human being, in violation of PENAL CODE SECTION 187(a) and PENAL CODE SECTION 664.

And it is further alleged that in the commission and attempted commission of the above offense, the defendant, BYREESE TAYLOR, intentionally and personally discharged a firearm, to wit: a semiautomatic handgun, within the meaning of PENAL CODE SECTION 12022.53(c).

And it is further alleged that the defendant BYREESE TAYLOR did commit the above felony offense 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 within the meaning of PENAL CODE SECTION 186.22(b)(1).

CHARGES (cont'd)

COUNT 16 - CRIMINAL STREET GANG - CONSPIRACY TO COMMIT FELONY

On or about February 12, 2014, JUSTIN ANTONIO ANDERSON, ALVIN RANDOLPH BANKS, DARRYL LAWRENCE CHARLES JR., DESMOND RAYSHAWN CRISP, BRANDON DUNCAN, GLENN ROY GRAY, AARON WAYNE HARVEY, JAWAUN DESHAY JONES, CEDRIC CHARLES JORDAN, STANLEY BERNARD KING JR., FRANKLIN LAMBERTH III, ANTHONY ROBINSON, TEVONTE STRIPLING, BYREESE TAYLOR, and DEON WINTERS committed the crime of Criminal Street Gang Conspiracy, in violation of Penal Code Section 182.5, a felony, by unlawfully and actively participating in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of criminal gang activity and did willfully promote, further, assist and benefit from felonious criminal conduct by members of that gang, to wit: the crimes of Attempted Murder, in violation of Penal Code sections 664/187, committed on or about February 12, 2014, in violation of PENAL CODE SECTION 182.5.

NOTICE: Any defendant named on this complaint who is on criminal probation in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's probation, on any and all such probation grants, utilizing the same evidence, at the preliminary hearing. Defenses to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

NOTICE: Any defendant named on this complaint who is on Mandatory Supervision in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's Mandatory Supervision pursuant to Penal Code Sections 1170(h)(5)(B) and 1203.2, on any and all such grants, utilizing the same evidence, at the preliminary hearing. Defense to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

Pursuant to PENAL CODE SECTION 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by PENAL CODE SECTION 1054.3.

Sheriff's records indicate that as of the booking date one or more defendants have not yet provided a DNA sample to the DOJ database. Pursuant to Penal Code Section 296(e), the court shall order collection of DNA from the defendant(s) if advised by the prosecuting attorney that a sample is required but has not been provided by the defendant. Pursuant to Penal Code sections 296/296.1, if not already required from a past conviction, any defendants who have not done so will be required to provide a sample upon conviction of this felony offense.

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant JAWAUN DESHAY JONES in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant DARRYL LAWRENCE CHARLES JR. in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant ALVIN RANDOLPH BANKS in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant GLENN ROY GRAY in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant JUSTIN ANTONIO ANDERSON in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant AARON WAYNE HARVEY in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant BRANDON DUNCAN in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant CEDRIC CHARLES JORDAN in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant STANLEY BERNARD KING JR. in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant FRANKLIN LAMBERTH III in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant TEVONTE STRIPLING in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant ANTHONY ROBINSON in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant BYREESE TAYLOR in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant DEON WINTERS in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant DESMOND RAYSHAWN CRISP in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER CD256609, CONSISTS OF 16 COUNTS.

Executed at City of San Diego, County of San Diego, State of California, on November 18, 2014.

COMPLAINANT

INFORMATION

BONNIE M. DUMANIS
District Attorney
County of San Diego
State of California
by:

Date

Deputy District Attorney