

1 TORI VERBER SALAZAR  
District Attorney, County of San Joaquin  
2 State Bar Number  
By: Jennifer Crampton, SBN 300538  
3 Deputy District Attorney  
222 E. Weber Avenue, First Floor, Room 101,  
4 P.O. Box 990  
Stockton, California 95201

5 Telephone: (209) 468-2400

6 Attorneys for Plaintiff  
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN JOAQUIN  
9 STOCKTON BRANCH

10  
11 THE PEOPLE OF THE STATE OF CALIFORNIA,  
12 Plaintiff,

13 vs.

14 NICHOLAS PATRICK BLOED,

15 Defendant(s).

No. SP22-08620, SP22-13601,  
SP22-15357, SP22-20830,  
SP22-21080, SP22-15949  
STOCKTON POLICE  
DEPARTMENT CASE  
DA Case: 0929463

Complaint No: 202211100004

COMPLAINT

16  
17 I, the undersigned, say, on information and belief, that in the County of SAN JOAQUIN, State  
18 of California:  
19

20 **COUNT 1: Code Section PC 220(A)(1) ASSAULT W/INTENT TO COMMIT**  
21 **MAYHEM, RAPE, SODOMY, ORAL COP.,ETC**  
22

23 On or about October 1, 2021 – March 31, 2022 in the County of San Joaquin, California,  
24 NICHOLAS PATRICK BLOED did commit the crime of ASSAULT WITH INTENT TO  
25 COMMIT MAYHEM, RAPE, SODOMY, ORAL COPULATION, in violation of Section  
26 220(a)(1) of the Penal Code, a FELONY, who at the time and place last aforesaid, did  
27 unlawfully assault Confidential Victim #1 with the intent to commit an act of sodomy in  
28

1 violation of Penal Code Section 286(c)(2)(A), to wit: "Photos Incident".

2  
3 VULNERABLE: Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
4 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
5 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
6 Code section 1170(b).

7  
8 PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
9 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
10 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
11 Penal Code section 1170(b).

12  
13 TRUST: Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
14 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
15 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
16 and Penal Code section 1170(b).

17  
18 For a further and separate cause of complaint, being a different offense from but connected in  
19 its commission with the charge(s) above, complainant further complains and says:

20  
21 **COUNT 2: Code Section PC 149 ASSAULT BY PUBLIC OFFICER**

22 On or about October 1, 2021 – March 31, 2022 in the County of San Joaquin, California,  
23 NICHOLAS PATRICK BLOED did the crime of ASSAULT BY PUBLIC OFFICER, in  
24 violation of Section 149 of the Penal Code, a FELONY, who at the time and place last  
25 aforesaid, did as a public officer, acting under color of authority and without lawful necessity,  
26 assault another, to-wit: Confidential Victim #1, to wit: "Photos Incident".

1 VULNERABLE: Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
2 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
3 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
4 Code section 1170(b).

5  
6 PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
7 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
8 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
9 Penal Code section 1170(b).

10  
11 TRUST: Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
12 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
13 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
14 and Penal Code section 1170(b).

15  
16 For a further and separate cause of complaint, being a different offense from but connected in  
17 its commission with the charge(s) above, complainant further complains and says:

18  
19 **COUNT 3: Code Section PC 149 ASSAULT BY PUBLIC OFFICER**

20 On or about October 1, 2021 – March 31, 2022 in the County of San Joaquin, California,  
21 NICHOLAS PATRICK BLOED did the crime of ASSAULT BY PUBLIC OFFICER, in  
22 violation of Section 149 of the Penal Code, a FELONY, who at the time and place last  
23 aforesaid, did as a public officer, acting under color of authority and without lawful necessity,  
24 assault another, to-wit: Confidential Victim #1, to wit: "Pat Search Incident".

1 VULNERABLE: Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
2 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
3 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
4 Code section 1170(b).

5  
6 PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
7 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
8 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
9 Penal Code section 1170(b).

10  
11 TRUST: Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
12 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
13 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
14 and Penal Code section 1170(b).

15  
16 For a further and separate cause of complaint, being a different offense from but connected in  
17 its commission with the charge(s) above, complainant further complains and says:

18  
19 **COUNT 4: Code Section PC 287(C)(2)(A) ORAL COPULATION BY USE OF FORCE**  
20 **OR INJURY**

21 On or about May 1, 2020 – September 30, 2020 in the County of San Joaquin, California,  
22 NICHOLAS PATRICK BLOED did commit the crime of FORCIBLE ORAL COPULATION,  
23 in violation of Section 287(c)(2)(A) of the Penal Code, a FELONY, who at the time and place  
24 last aforesaid did unlawfully participate in an act of oral copulation with Confidential Victim  
25 #2 and did accomplish said act against said victim(s) will by force, violence, duress, menace,  
26 and fear of immediate and unlawful bodily injury to said victim and to another, to wit: "Bathing  
27 Suit Incident". NOTICE: The above offense is a serious felony within the meaning of Penal  
28

1 Code Section 1192.7(C). NOTICE: Conviction of this offense will require the court to order  
2 you to submit to a blood test for evidence of antibodies to the probable causative agent of  
3 Acquired Immune Deficiency Syndrome (AIDS). Penal Code Section 1202.1. NOTICE:  
4 Conviction of this offense will require you to register pursuant to Penal Code Section  
5 290. Willful failure to register is a crime. NOTICE: Conviction of this offense will require you  
6 to provide specimens and samples pursuant to Penal Code Section 296. Willful refusal to  
7 provide the specimens and samples is a crime. NOTICE: Adjudication as a ward of the court  
8 for this offense and a disposition to the California Youth Authority will require you to provide  
9 specimens and samples pursuant to Penal Code Section 296. Willful refusal to provide the  
10 specimens and samples is a crime.

11  
12 VULNERABLE: Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
13 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
14 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
15 Code section 1170(b).

16  
17 PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
18 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
19 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
20 Penal Code section 1170(b).

21  
22 TRUST: Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
23 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
24 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
25 and Penal Code section 1170(b).

1 For a further and separate cause of complaint, being a different offense from but connected in  
2 its commission with the charge(s) above, complainant further complains and says:

3  
4 **COUNT 5: Code Section PC 149 ASSAULT BY PUBLIC OFFICER**

5 On or about May 1, 2020 – September 30, 2020 in the County of San Joaquin, California,  
6 NICHOLAS PATRICK BLOED did the crime of ASSAULT BY PUBLIC OFFICER, in  
7 violation of Section 149 of the Penal Code, a FELONY, who at the time and place last  
8 aforesaid, did as a public officer, acting under color of authority and without lawful necessity,  
9 assault another, to-wit: Confidential Victim # 2, to wit: "Bathing Suit Incident".

10  
11 **VULNERABLE:** Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
12 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
13 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
14 Code section 1170(b).

15  
16 **PLANNING:** Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
17 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
18 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
19 Penal Code section 1170(b).

20  
21 **TRUST:** Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
22 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
23 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
24 and Penal Code section 1170(b).

25  
26 For a further and separate cause of complaint, being a different offense from but connected in  
27 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 6: Code Section PC 502(C)(3) UNAUTH USE COMP SRVCS**

2 On or about February 21, 2022 in the County of San Joaquin, California, NICHOLAS  
3 PATRICK BLOED did commit the crime of UNAUTHORIZED USE OF COMPUTER  
4 SERVICE, in violation of Section 502(c)(3) of the Penal Code, a FELONY, who at the time  
5 and place last aforesaid, did knowingly and without permission use or cause to be used  
6 computer services.

7  
8 **VULNERABLE:** Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
9 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
10 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
11 Code section 1170(b).

12  
13 **PLANNING:** Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
14 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
15 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
16 Penal Code section 1170(b).

17  
18 **TRUST:** Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
19 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
20 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
21 and Penal Code section 1170(b).

22  
23 For a further and separate cause of complaint, being a different offense from but connected in  
24 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 7: Code Section PC 149 ASSAULT BY PUBLIC OFFICER**

2 On or about August 1, 2021 in the County of San Joaquin, California, NICHOLAS PATRICK  
3 BLOED did the crime of ASSAULT BY PUBLIC OFFICER, in violation of Section 149 of the  
4 Penal Code, a FELONY, who at the time and place last aforesaid, did as a public officer, acting  
5 under color of authority and without lawful necessity, assault another, to-wit: Confidential  
6 Victim #3.

7  
8 VULNERABLE: Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
9 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
10 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
11 Code section 1170(b).

12  
13 PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
14 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
15 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
16 Penal Code section 1170(b).

17  
18 TRUST: Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
19 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
20 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
21 and Penal Code section 1170(b).

22  
23 For a further and separate cause of complaint, being a different offense from but connected in  
24 its commission with the charge(s) above, complainant further complains and says:



1 **COUNT 8: Code Section PC 68 ASK/RECEIVE BRIBE**

2 On or about August 1, 2021 in the County of San Joaquin, California, NICHOLAS PATRICK  
3 BLOED did commit the crime of OFFICER ASKING OR RECEIVING BRIBE, in violation of  
4 Section 68 of the Penal Code, a FELONY, did willfully and unlawfully being and employee of  
5 the State of California, city of Stockton, asked for, received, or agreed to receive, a bribe, from  
6 Confidential Victim #3 upon agreement or understanding that their action shall be influenced.

7  
8 **VULNERABLE:** Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
9 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
10 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
11 Code section 1170(b).

12  
13 **PLANNING:** Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
14 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
15 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
16 Penal Code section 1170(b).

17  
18 **TRUST:** Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
19 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
20 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
21 and Penal Code section 1170(b).

22  
23 For a further and separate cause of complaint, being a different offense from but connected in  
24 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 9: Code Section PC 68 ASK/RECEIVE BRIBE**

2 On or about November 11, 2021 – November 12, 2021 in the County of San Joaquin,  
3 California, NICHOLAS PATRICK BLOED did commit the crime of OFFICER ASKING OR  
4 RECEIVING BRIBE, in violation of Section 68 of the Penal Code, a FELONY, did willfully  
5 and unlawfully being and employee of the State of California, city of Stockton, asked for,  
6 received, or agreed to receive, a bribe, from Confidential Victim #4 upon agreement or  
7 understanding that their action shall be influenced.

8  
9 VULNERABLE: Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
10 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
11 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
12 Code section 1170(b).

13  
14 PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
15 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
16 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
17 Penal Code section 1170(b).

18  
19 TRUST: Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
20 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
21 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
22 and Penal Code section 1170(b).

23  
24 For a further and separate cause of complaint, being a different offense from but connected in  
25 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 10: Code Section PC 502(C)(3) UNAUTH USE COMP SRVCS**

2 On or about November 11, 2021 – November 12, 2021 in the County of San Joaquin,  
3 California, NICHOLAS PATRICK BLOED did commit the crime of UNAUTHORIZED USE  
4 OF COMPUTER SERVICE, in violation of Section 502(c)(3) of the Penal Code, a FELONY,  
5 who at the time and place last aforesaid, did knowingly and without permission use or cause to  
6 be used computer services.

7  
8 **VULNERABLE:** Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
9 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
10 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
11 Code section 1170(b).

12  
13 **PLANNING:** Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
14 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
15 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
16 Penal Code section 1170(b).

17  
18 **TRUST:** Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
19 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
20 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
21 and Penal Code section 1170(b).

22  
23 For a further and separate cause of complaint, being a different offense from but connected in  
24 its commission with the charge(s) above, complainant further complains and says:

1 **COUNT 11: Code Section 647 (B)(2) PROSTITUTION – PROVIDING**  
2 **COMPENSATION**

3 On or about April 30, 2033 – May 1, 2022 in the County of San Joaquin, California,  
4 NICHOLAS PATRICK BLOED did commit the crime of PROSTITUTION – PROVIDING  
5 COMPENSATION, in violation of Section 647(b)(2) of the Penal Code, a MISDEMEANOR,  
6 who at the time and place last aforesaid, did willfully and unlawfully solicit and agree to  
7 engage in an act of prostitution and did engage in an act of prostitution with another person  
8 who is 18 years of age and older, Confidential Victim #5, in exchange for the individual  
9 providing compensation, money, and anything of value to the other person. "NOTICE:  
10 Conviction of this offense will require the court, where appropriate, to refer to a program as  
11 specified in Penal Code section 1202.6."

12  
13 For a further and separate cause of complaint, being a different offense from but connected in  
14 its commission with the charge(s) above, complainant further complains and says:

15  
16 **COUNT 12: Code Section PC 286(C)(2)(A) SODOMY BY USE OF FORCE**

17 On or about May 1, 2019 – September 30, 2019 in the County of San Joaquin, California,  
18 NICHOLAS PATRICK BLOED did commit the crime of SODOMY BY USE OF FORCE, in  
19 violation of Section 286(c)(2)(A) of the Penal Code, a FELONY, who at the time and place last  
20 aforesaid, did unlawfully participate in an act of sodomy with Confidential Victim #6, and did  
21 accomplish said act against said victim's will by force, violence, duress, menace and fear of  
22 immediate and unlawful bodily injury to said victim and to another, to wit: "Day After First  
23 Contact Incident". NOTICE: The above offense is a serious felony within the meaning of Penal  
24 Code Section 1192.7(c).

1 VULNERABLE: Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
2 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
3 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
4 Code section 1170(b).

5  
6 PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
7 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
8 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
9 Penal Code section 1170(b).

10  
11 TRUST: Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
12 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
13 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
14 and Penal Code section 1170(b).

15  
16 For a further and separate cause of complaint, being a different offense from but connected in  
17 its commission with the charge(s) above, complainant further complains and says:

18  
19 **COUNT 13: Code Section PC 287(C)(2)(A) ORAL COPULATION BY USE OF FORCE**  
20 **OR INJURY**

21 On or about May 1, 2019 – September 30, 2019 in the County of San Joaquin, California,  
22 NICHOLAS PATRICK BLOED did commit the crime of FORCIBLE ORAL COPULATION,  
23 in violation of Section 287(c)(2)(A) of the Penal Code, a FELONY, who at the time and place  
24 last aforesaid did unlawfully participate in an act of oral copulation with Confidential Victim  
25 #6 and did accomplish said act against said victim(s) will by force, violence, duress, menace,  
26 and fear of immediate and unlawful bodily injury to said victim and to another, to wit:"Day  
27 After First Contact Incident". NOTICE: The above offense is a serious felony within the

1 meaning of Penal Code Section 1192.7(C). NOTICE: Conviction of this offense will require  
2 the court to order you to submit to a blood test for evidence of antibodies to the probable  
3 causative agent of Acquired Immune Deficiency Syndrome (AIDS).Penal Code Section  
4 1202.1. NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
5 Section 290. Willful failure to register is a crime. NOTICE: Conviction of this offense will  
6 require you to provide specimens and samples pursuant to Penal Code Section 296. Willful  
7 refusal to provide the specimens and samples is a crime. NOTICE: Adjudication as a ward of  
8 the court for this offense and a disposition to the California Youth Authority will require you to  
9 provide specimens and samples pursuant to Penal Code Section 296. Willful refusal to provide  
10 the specimens and samples is a crime.

11  
12 VULNERABLE: Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
13 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
14 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
15 Code section 1170(b).

16  
17 PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
18 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
19 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
20 Penal Code section 1170(b).

21  
22 TRUST: Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
23 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
24 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
25 and Penal Code section 1170(b).

1 For a further and separate cause of complaint, being a different offense from but connected in  
2 its commission with the charge(s) above, complainant further complains and says:

3  
4 **COUNT 14: Code Section PC 68 ASK/RECEIVE BRIBE**

5 On or about June 1, 2021 – June 30, 2021 in the County of San Joaquin, California,  
6 NICHOLAS PATRICK BLOED did commit the crime of OFFICER ASKING OR  
7 RECEIVING BRIBE, in violation of Section 68 of the Penal Code, a FELONY, did willfully  
8 and unlawfully being and employee of the State of California, city of Stockton, asked for,  
9 received, or agreed to receive, a bribe, from Confidential Victim #7 upon agreement or  
10 understanding that their action shall be influenced.

11  
12 VULNERABLE: Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
13 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
14 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
15 Code section 1170(b).

16  
17 PLANNING: Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
18 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
19 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
20 Penal Code section 1170(b).

21  
22 TRUST: Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
23 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
24 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
25 and Penal Code section 1170(b).

1 For a further and separate cause of complaint, being a different offense from but connected in  
2 its commission with the charge(s) above, complainant further complains and says:

3  
4 **COUNT 15: Code Section PC 149 ASSAULT BY PUBLIC OFFICER**

5 On or about January 1, 2019 – December 31, 2019 in the County of San Joaquin, California,  
6 NICHOLAS PATRICK BLOED did the crime of ASSAULT BY PUBLIC OFFICER, in  
7 violation of Section 149 of the Penal Code, a FELONY, who at the time and place last  
8 aforesaid, did as a public officer, acting under color of authority and without lawful necessity,  
9 assault another, to-wit: Confidential Victim #8, to wit: "First Contact Incident".

10  
11 **VULNERABLE:** Rule of Court 4.421(a)(3) and Penal Code section 1170(b) It is further  
12 alleged that said defendant, NICHOLAS PATRICK BLOED, committed the above crime upon  
13 a victim that was particularly vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal  
14 Code section 1170(b).

15  
16 **PLANNING:** Rule of 4.421(a)(8) and Penal Code section 1170(b) It is further alleged that said  
17 defendant, NICHOLAS PATRICK BLOED, committed the above crime in a way that indicates  
18 planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and  
19 Penal Code section 1170(b).

20  
21 **TRUST:** Rule of Court 4.421(a)(11) and Penal Code section 1170(b) It is further alleged that  
22 said defendant, NICHOLAS PATRICK BLOED, committed the above crime by taking  
23 advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11)  
24 and Penal Code section 1170(b).



1 If the above-named defendant(s) is/are presently on probation in San Joaquin County, any  
2 evidence presented at a preliminary hearing in the instant case will be used not only as a basis  
3 for a holding order in this case but also as evidence of a violation of probation and, at any  
4 formal hearing on that violation of probation, the People will move the transcript of the  
5 preliminary hearing into evidence as a basis for the violation.

6  
7 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that the  
8 defendant and their attorney disclose to the People all information and materials described in  
9 Penal Code Section 1054.3.

10  
11 I declare under penalty of perjury that the foregoing is true and correct except for those things  
12 stated on information and belief and those I believe to be true.

13  
14 Executed on November 4, 2022, at Stockton, California.

15 

16 JENNIFER CRAMPTON  
17 Deputy District Attorney

18 JAC/bx

19  
20  
21  
22  
23  
24  
25  
26  
27  
28