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SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN

Stockton Branch

The People of the State of California,
Plaintiff,

v.

DOROTHY MAY BELL
CR-2020-0012921

Defendant(s).

No. SP20-44932
SP20-34474
SPD CASE
DA Case: CR-2020-4232747

1ST AMENDED
COMPLAINT

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

COUNT 1: TORTURE PC.206

On or about November 6, 2020 - November 27, 2020, in the County of
San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
TORTURE, in violation of Section 206 of the Penal Code, a FELONY,
who at the time and place last aforesaid did willfully and

1 unlawfully and with the intent to cause cruel and extreme pain and
2 suffering for the purpose of revenge, extortion, persuasion and for
3 a sadistic purpose, inflict great bodily injury, as defined in Penal
4 Code section 12022.7 upon JANE I. DOE.

5
6 For a further and separate cause of complaint, being a different
7 offense from but connected in its commission with the charge(s)
8 above, complainant further complains and says:
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10
11 **COUNT 2: KIDNAPPING PC.207 (A)**

12 On or about November 6, 2020 - November 27, 2020, in the County of
13 San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
14 KIDNAPPING, in violation of Section 207(a) of the Penal Code, a
15 FELONY, who at the time and place last aforesaid, did willfully and
16 forcibly steal, take and arrest JANE I. DOE in SAN JOAQUIN County,
17 California, and did take the said victim into another Country,
18 State, County or another part of the county of SAN JOAQUIN. It is
19 further alleged that the above offense is a serious FELONY within
20 the meaning of Penal Code Section 1192.7(c) (20).
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22

23 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022 (B)**

24 It is further alleged that in the commission and attempted
25 commission of the above offense, the said defendant(s), DOROTHY MAY
26 BELL personally used a deadly and dangerous weapon(s), to wit: A
27 KNIFE, A HAMMER, A GOLF CLUB and A FIREARM, said use not being an
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1 element of the above offense, within the meaning of Penal Code
2 Section 12022(b).

3
4 **INFLICTION OF GREAT BODILY INJURY PC.12022.7(E)**

5 It is further alleged that in the commission of the above offense
6 the said defendant, DOROTHY MAY BELL, personally inflicted great
7 bodily injury under circumstances involving domestic violence upon
8 JANE I. DOE, within the meaning of Penal Code Section 12022.7(e) and
9 also causing the above offense to be a serious felony within the
10 meaning of Penal Code Section 1192.7(c)(8).
11

12
13 For a further and separate cause of complaint, being a different
14 offense from but connected in its commission with the charge(s)
15 above, complainant further complains and says:
16

17 **COUNT 3: FALSE IMPRISONMENT PC.236**

18 On or about November 6, 2020 - November 27, 2020, in the County of
19 San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
20 FALSE IMPRISONMENT, in violation of Section 236 of the Penal Code, a
21 FELONY, who at the time and place last aforesaid, did willfully and
22 unlawfully violate the personal liberty of JANE I. DOE.
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1 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

2 It is further alleged that in the commission and attempted
3 commission of the above offense, the said defendant(s), DOROTHY MAY
4 BELL personally used a deadly and dangerous weapon(s), to wit: A
5 KNIFE, A HAMMER, A GOLF CLUB and A FIREARM, said use not being an
6 element of the above offense, within the meaning of Penal Code
7 Section 12022(b).

9
10 **INFLICTION OF GREAT BODILY INJURY PC.12022.7(E)**

11 It is further alleged that in the commission of the above offense
12 the said defendant, DOROTHY MAY BELL, personally inflicted great
13 bodily injury under circumstances involving domestic violence upon
14 JANE I. DOE, within the meaning of Penal Code Section 12022.7(e) and
15 also causing the above offense to be a serious felony within the
16 meaning of Penal Code Section 1192.7(c)(8).

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

22
23 **COUNT 4: ASSAULT WITH DEADLY WEAPON; NOT FIREARM PC.245(A)(1)**

24 On or about November 6, 2020 - November 27, 2020, in the County of
25 San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
26 ASSAULT WITH A DEADLY WEAPON; NOT FIREARM, in violation of Section
27 245(a)(1) of the Penal Code, a FELONY, who at the time and place
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1 last aforesaid, did willfully and unlawfully commit an assault upon
2 JANE I. DOE with a deadly weapon or instrument other than a firearm,
3 to-wit: A KNIFE.

4 **INFLICTION OF GREAT BODILY INJURY PC.12022.7(E)**

5 It is further alleged that in the commission of the above offense
6 the said defendant, DOROTHY MAY BELL, personally inflicted great
7 bodily injury under circumstances involving domestic violence upon
8 JANE I. DOE, within the meaning of Penal Code Section 12022.7(e) and
9 also causing the above offense to be a serious felony within the
10 meaning of Penal Code Section 1192.7(c)(8).
11

12
13 For a further and separate cause of complaint, being a different
14 offense from but connected in its commission with the charge(s)
15 above, complainant further complains and says:
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17
18 **COUNT 5: ASSAULT WITH DEADLY WEAPON; NOT FIREARM PC.245(A)(1)**

19 On or about November 6, 2020 - November 27, 2020, in the County of
20 San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
21 ASSAULT WITH A DEADLY WEAPON; NOT FIREARM, in violation of Section
22 245(a)(1) of the Penal Code, a FELONY, who at the time and place
23 last aforesaid, did willfully and unlawfully commit an assault upon
24 JANE I. DOE with a deadly weapon or instrument other than a firearm,
25 to-wit: A HAMMER.
26

1 **INFLICTION OF GREAT BODILY INJURY PC.12022.7(E)**

2 It is further alleged that in the commission of the above offense
3 the said defendant, DOROTHY MAY BELL, personally inflicted great
4 bodily injury under circumstances involving domestic violence upon
5 JANE I. DOE, within the meaning of Penal Code Section 12022.7(e) and
6 also causing the above offense to be a serious felony within the
7 meaning of Penal Code Section 1192.7(c) (8).
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9
10 For a further and separate cause of complaint, being a different
11 offense from but connected in its commission with the charge(s)
12 above, complainant further complains and says:
13

14 **COUNT 6: ASSAULT WITH DEADLY WEAPON; NOT FIREARM PC.245(A)(1)**

15 On or about November 6, 2020 - November 27, 2020, in the County of
16 San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
17 ASSAULT WITH A DEADLY WEAPON; NOT FIREARM, in violation of Section
18 245(a)(1) of the Penal Code, a FELONY, who at the time and place
19 last aforesaid, did willfully and unlawfully commit an assault upon
20 JANE I. DOE with a deadly weapon or instrument other than a firearm,
21 to-wit: A GOLF CLUB.
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23

24 **INFLICTION OF GREAT BODILY INJURY PC.12022.7(E)**

25 It is further alleged that in the commission of the above offense
26 the said defendant, DOROTHY MAY BELL, personally inflicted great
27 bodily injury under circumstances involving domestic violence upon
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1 JANE I. DOE, within the meaning of Penal Code Section 12022.7(e) and
2 also causing the above offense to be a serious felony within the
3 meaning of Penal Code Section 1192.7(c) (8).
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5 For a further and separate cause of complaint, being a different
6 offense from but connected in its commission with the charge(s)
7 above, complainant further complains and says:
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9
10 **COUNT 7: ASSAULT W/FIREARM ON PERSON PC.245 (A) (2)**

11 On or about November 6, 2020 - November 27, 2020, in the County of
12 San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
13 ASSAULT WITH A FIREARM, in violation of Section 245(a) (2) of the
14 Penal Code, a FELONY, who at the time and place last aforesaid, did
15 willfully and unlawfully commit an assault on JANE I. DOE with a
16 firearm. It is further alleged that the above offense is a serious
17 felony within the meaning of Penal Code Section 1192.7(C) (8).
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19
20 **INFLICTION OF GREAT BODILY INJURY PC.12022.7 (E)**

21 It is further alleged that in the commission of the above offense
22 the said defendant, DOROTHY MAY BELL, personally inflicted great
23 bodily injury under circumstances involving domestic violence upon
24 JANE I. DOE, within the meaning of Penal Code Section 12022.7(e) and
25 also causing the above offense to be a serious felony within the
26 meaning of Penal Code Section 1192.7(c) (8).
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1 For a further and separate cause of complaint, being a different
2 offense from but connected in its commission with the charge(s)
3 above, complainant further complains and says:
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5 **COUNT 8: CORPORAL INJURY TO SPOUSE/COHABITANT/PARENT OF CHILD**
6 **PC.273.5 (A)**
7

8 On or about November 6, 2020 - November 27, 2020, in the County of
9 San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
10 CORPORAL INJURY TO SPOUSE/FORMER SPOUSE, COHABITANT/FORMER
11 COHABITANT, FIANCE/FORMER ENGAGEMENT RELATIONSHIP, DATING/FORMER
12 DATING RELATIONSHIP, PARENT OF CHILD, in violation of Section
13 273.5(A), a FELONY, who at the time and place last aforesaid, did
14 willfully and unlawfully inflict a corporal injury resulting in a
15 traumatic condition upon JANE I. DOE, who was then and there the
16 spouse/former spouse, cohabitant/former cohabitant, fiancé/former
17 engagement relationship, dating/former dating relationship or parent
18 of child of the defendant.
19

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21 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022 (B)**

22 It is further alleged that in the commission and attempted
23 commission of the above offense, the said defendant(s), DOROTHY MAY
24 BELL personally used a deadly and dangerous weapon(s), to wit: A
25 KNIFE, A HAMMER, A GOLF CLUB and A FIREARM, said use not being an
26 element of the above offense, within the meaning of Penal Code
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1 Section 12022(b).

2
3 **INFLICTION OF GREAT BODILY INJURY PC.12022.7(E)**

4 It is further alleged that in the commission of the above offense
5 the said defendant, DOROTHY MAY BELL, personally inflicted great
6 bodily injury under circumstances involving domestic violence upon
7 JANE I. DOE, within the meaning of Penal Code Section 12022.7(e) and
8 also causing the above offense to be a serious felony within the
9 meaning of Penal Code Section 1192.7(c)(8).
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11
12 For a further and separate cause of complaint, being a different
13 offense from but connected in its commission with the charge(s)
14 above, complainant further complains and says:
15

16 **COUNT 9: CRIMINAL THREATS PC.422(a)**

17 On or about November 6, 2020 - November 27, 2020, in the County of
18 San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
19 CRIMINAL THREATS, in violation of Section 422(a) of the Penal Code,
20 a FELONY, who at the time and place last aforesaid, did willfully
21 and unlawfully threaten to commit a crime which would result in
22 death or great bodily injury to another, to-wit: JANE I. DOE with
23 the specific intent that the statement be taken as a threat. It is
24 further alleged that the threatened crime, on its face and under the
25 circumstances in which it was made, was so unequivocal,
26 unconditional, immediate and specific as to convey to said victim a
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1 gravity of purpose and an immediate prospect of execution. It is
2 further alleged that the said victim was reasonably in sustained
3 fear of his or her safety and the safety of his or her immediate
4 family.
5

6 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

7 It is further alleged that in the commission and attempted
8 commission of the above offense, the said defendant(s), DOROTHY MAY
9 BELL personally used a deadly and dangerous weapon(s), to wit: A
10 KNIFE, A HAMMER, A GOLF CLUB and A FIREARM, said use not being an
11 element of the above offense, within the meaning of Penal Code
12 Section 12022(b).
13
14

15 **INFLICTION OF GREAT BODILY INJURY PC.12022.7(E)**

16 It is further alleged that in the commission of the above offense
17 the said defendant, DOROTHY MAY BELL, personally inflicted great
18 bodily injury under circumstances involving domestic violence upon
19 JANE I. DOE, within the meaning of Penal Code Section 12022.7(e) and
20 also causing the above offense to be a serious felony within the
21 meaning of Penal Code Section 1192.7(c)(8).
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23

24 For a further and separate cause of complaint, being a different
25 offense from but connected in its commission with the charge(s)
26 above, complainant further complains and says:
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1 **COUNT 10: FIRST DEGREE BURGLARY, PERSON PRESENT PC.459**

2 On or about November 28, 2020, in the County of San Joaquin,
3 California, DOROTHY MAY BELL, did commit the crime of RESIDENTIAL
4 BURGLARY in the FIRST DEGREE, in violation of 459 of the Penal Code,
5 a FELONY, who at the time and place last aforesaid, did willfully
6 and unlawfully enter an inhabited dwelling house and trailer coach
7 and inhabited portion of a building occupied by JANE T. DOE with the
8 intent to commit larceny and any felony. "NOTICE: The above offense
9 is a serious felony within the meaning of Penal Code Section
10 1192.7(c) and a violent felony within the meaning of Penal Code
11 667.5(c)". It is further alleged that the above offense is a
12 violation of Penal Code Section 462(a). It is further alleged that
13 the above is a violent felony within the meaning of Penal Code
14 667.5(c) in that another person, other than an accomplice, was
15 present in the residence during the commission of the above offense.
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19 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

20 It is further alleged that in the commission and attempted
21 commission of the above offense, the said defendant(s), DOROTHY MAY
22 BELL personally used a deadly and dangerous weapon(s), to wit: A
23 KNIFE, said use not being an element of the above offense, within
24 the meaning of Penal Code Section 12022(b).
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1 For a further and separate cause of complaint, being a different
2 offense from but connected in its commission with the charge(s)
3 above, complainant further complains and says:
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5 **COUNT 11: KIDNAPPING PC.207 (A)**

6 On or about November 28, 2020, in the County of San Joaquin,
7 California, DOROTHY MAY BELL, did commit the crime of KIDNAPPING, in
8 violation of Section 207(a) of the Penal Code, a FELONY, who at the
9 time and place last aforesaid, did willfully and forcibly steal,
10 take and arrest JANE T. DOE in SAN JOAQUIN County, California, and
11 did take the said victim into another Country, State, County or
12 another part of the county of SAN JOAQUIN. It is further alleged
13 that the above offense is a serious FELONY within the meaning of
14 Penal Code Section 1192.7(c) (20).
15
16

17 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022 (B)**

18 It is further alleged that in the commission and attempted
19 commission of the above offense, the said defendant(s), DOROTHY MAY
20 BELL personally used a deadly and dangerous weapon(s), to wit: A
21 KNIFE, said use not being an element of the above offense, within
22 the meaning of Penal Code Section 12022(b).
23
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25 For a further and separate cause of complaint, being a different
26 offense from but connected in its commission with the charge(s)
27 above, complainant further complains and says:
28

1 **COUNT 12: ROBBERY PC.211**

2 On or about November 28, 2020, in the County of San Joaquin,
3 California, DOROTHY MAY BELL, did commit the crime of FIRST DEGREE
4 ROBBERY, in violation of Section 211 of the Penal Code, a FELONY,
5 who at the time and place last aforesaid, did willfully, unlawfully,
6 and by means of force and fear take personal property from the
7 person, possession, and immediate presence of JANE T. DOE, to wit: A
8 CELL PHONE. It is further alleged that the above offense is a
9 serious felony within the meaning of Penal Code Section
10 1192.7(c)(19).
11

12
13 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

14 It is further alleged that in the commission and attempted
15 commission of the above offense, the said defendant(s), DOROTHY MAY
16 BELL personally used a deadly and dangerous weapon(s), to wit: A
17 KNIFE, said use not being an element of the above offense, within
18 the meaning of Penal Code Section 12022(b).
19

20
21 For a further and separate cause of complaint, being a different
22 offense from but connected in its commission with the charge(s)
23 above, complainant further complains and says:

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1 **COUNT 13: CRIMINAL THREATS PC.422(a)**

2 On or about November 28, 2020, in the County of San Joaquin,
3 California, DOROTHY MAY BELL, did commit the crime of CRIMINAL
4 THREATS, in violation of Section 422(a) of the Penal Code, a FELONY,
5 who at the time and place last aforesaid, did willfully and
6 unlawfully threaten to commit a crime which would result in death or
7 great bodily injury to another, to-wit: JANE T. DOE with the
8 specific intent that the statement be taken as a threat. It is
9 further alleged that the threatened crime, on its face and under the
10 circumstances in which it was made, was so unequivocal,
11 unconditional, immediate and specific as to convey to said victim a
12 gravity of purpose and an immediate prospect of execution. It is
13 further alleged that the said victim was reasonably in sustained
14 fear of his or her safety and the safety of his or her immediate
15 family.
16
17

18
19 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

20 It is further alleged that in the commission and attempted
21 commission of the above offense, the said defendant(s), DOROTHY MAY
22 BELL personally used a deadly and dangerous weapon(s), to wit: A
23 KNIFE, said use not being an element of the above offense, within
24 the meaning of Penal Code Section 12022(b).
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1 For a further and separate cause of complaint, being a different
2 offense from but connected in its commission with the charge(s)
3 above, complainant further complains and says:
4

5 **COUNT 14: ASSAULT WITH DEADLY WEAPON; NOT FIREARM PC.245(A) (1)**
6

7 On or about November 28, 2020, in the County of San Joaquin,
8 California, DOROTHY MAY BELL, did commit the crime of ASSAULT WITH A
9 DEADLY WEAPON; NOT FIREARM, in violation of Section 245(a) (1) of the
10 Penal Code, a FELONY, who at the time and place last aforesaid, did
11 willfully and unlawfully commit an assault upon JANE T. DOE with a
12 deadly weapon or instrument other than a firearm, to-wit: A KNIFE.
13

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

18 **COUNT 15: ELDER OR DEPENDENT ADULT ABUSE PC.368(B) (1)**
19

20 On or about November 28, 2020, in the County of San Joaquin,
21 California, DOROTHY MAY BELL, did commit the crime of ELDER OR
22 DEPENDENT ADULT ABUSE, in violation of Section 368(b) (1) of the
23 Penal Code, a FELONY, who at the time and place last aforesaid did,
24 under circumstances and conditions likely to produce great bodily
25 harm or death, knowingly and willfully cause or permit JANE T. DOE,
26 an elder or dependent adult, to suffer, or inflicted thereon,
27 unjustifiable physical pain or mental suffering or, having the care
28

1 or custody of said person, willfully caused or permitted him/her to
2 be placed in a situation in which his/her health was endangered.

3
4 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

5 It is further alleged that in the commission and attempted
6 commission of the above offense, the said defendant(s), DOROTHY MAY
7 BELL personally used a deadly and dangerous weapon(s), to wit: A
8 KNIFE, said use not being an element of the above offense, within
9 the meaning of Penal Code Section 12022(b).
10

11
12 For a further and separate cause of complaint, being a different
13 offense from but connected in its commission with the charge(s)
14 above, complainant further complains and says:
15

16 **COUNT 16: FALSE IMPRISONMENT OF DEPENDENT ADULT PC.368(F)**

17 On or about November 28, 2020, in the County of San Joaquin,
18 California, DOROTHY MAY BELL, did commit the crime of FALSE
19 IMPRISONMENT OF ELDER OR DEPENDENT ADULT, in violation of Section
20 368(f) of the Penal Code, a FELONY, who at the time and place last
21 aforesaid did willfully and unlawfully violate the personal liberty
22 of JANE T. DOE, an elder or dependent adult, said violation being
23 effected by violence, menace, fraud, and deceit.
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1 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

2 It is further alleged that in the commission and attempted
3 commission of the above offense, the said defendant(s), DOROTHY MAY
4 BELL personally used a deadly and dangerous weapon(s), to wit: A
5 KNIFE, said use not being an element of the above offense, within
6 the meaning of Penal Code Section 12022(b).
7

8
9 For a further and separate cause of complaint, being a different
10 offense from but connected in its commission with the charge(s)
11 above, complainant further complains and says:
12

13 **COUNT 17: FALSE IMPRISONMENT PC.236**

14 On or about November 28, 2020, in the County of San Joaquin,
15 California, DOROTHY MAY BELL, did commit the crime of FALSE
16 IMPRISONMENT, in violation of Section 236 of the Penal Code, a
17 FELONY, who at the time and place last aforesaid, did willfully and
18 unlawfully violate the personal liberty of JANE T. DOE.
19
20

21 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

22 It is further alleged that in the commission and attempted
23 commission of the above offense, the said defendant(s), DOROTHY MAY
24 BELL personally used a deadly and dangerous weapon(s), to wit: A
25 KNIFE, said use not being an element of the above offense, within
26 the meaning of Penal Code Section 12022(b).
27
28

1 For a further and separate cause of complaint, being a different
2 offense from but connected in its commission with the charge(s)
3 above, complainant further complains and says:
4

5 **COUNT 18: DISSUADING A WITNESS FROM REPORTING A CRIME PC.136.1(B) (1)**

6 On or about November 28, 2020, in the County of San Joaquin,
7 California, DOROTHY MAY BELL, did commit the crime of DISSUADING A
8 WITNESS FROM REPORTING A CRIME, in violation of Section 136.1(b) (1)
9 of the Penal Code, a FELONY, who at the time and place last
10 aforesaid, did willfully and unlawfully attempt to prevent and
11 dissuade JANE T. DOE, a victim and a witness of a crime from making
12 a report of such victimization to a peace officer, state and local
13 law enforcement officer, probation, parole and correctional officer,
14 prosecuting agency, and judge.
15
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17 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

18 It is further alleged that in the commission and attempted
19 commission of the above offense, the said defendant(s), DOROTHY MAY
20 BELL personally used a deadly and dangerous weapon(s), to wit: A
21 KNIFE, said use not being an element of the above offense, within
22 the meaning of Penal Code Section 12022(b).
23
24

25 For a further and separate cause of complaint, being a different
26 offense from but connected in its commission with the charge(s)
27 above, complainant further complains and says:
28

1 **COUNT 19: KIDNAPPING PC.207(A)**

2 On or about November 28, 2020, in the County of San Joaquin,
3 California, DOROTHY MAY BELL, did commit the crime of KIDNAPPING, in
4 violation of Section 207(a) of the Penal Code, a FELONY, who at the
5 time and place last aforesaid, did willfully and forcibly steal,
6 take and arrest JOHN A. DOE in SAN JOAQUIN County, California, and
7 did take the said victim into another Country, State, County or
8 another part of the county of SAN JOAQUIN. It is further alleged
9 that the above offense is a serious FELONY within the meaning of
10 Penal Code Section 1192.7(c)(20).
11

12
13 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

14 It is further alleged that in the commission and attempted
15 commission of the above offense, the said defendant(s), DOROTHY MAY
16 BELL personally used a deadly and dangerous weapon(s), to wit: A
17 KNIFE, said use not being an element of the above offense, within
18 the meaning of Penal Code Section 12022(b).
19

20
21 For a further and separate cause of complaint, being a different
22 offense from but connected in its commission with the charge(s)
23 above, complainant further complains and says:

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1 **COUNT 20: FALSE IMPRISONMENT PC.236**

2 On or about November 28, 2020, in the County of San Joaquin,
3 California, DOROTHY MAY BELL, did commit the crime of FALSE
4 IMPRISONMENT, in violation of Section 236 of the Penal Code, a
5 FELONY, who at the time and place last aforesaid, did willfully and
6 unlawfully violate the personal liberty of JOHN A. DOE.
7

8
9 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

10 It is further alleged that in the commission and attempted
11 commission of the above offense, the said defendant(s), DOROTHY MAY
12 BELL personally used a deadly and dangerous weapon(s), to wit: A
13 KNIFE, said use not being an element of the above offense, within
14 the meaning of Penal Code Section 12022(b).
15

16 For a further and separate cause of complaint, being a different
17 offense from but connected in its commission with the charge(s)
18 above, complainant further complains and says:
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20

21 **COUNT 21: CHILD ABUSE/ENDANGERMENT PC.273A(A)**

22 On or about November 28, 2020, in the County of San Joaquin,
23 California, DOROTHY MAY BELL, did commit the crime of CHILD
24 ABUSE/ENDANGERMENT, in violation of Section 273a(a) of the Penal
25 Code, a FELONY, who at the time and place last aforesaid, did
26 willfully and unlawfully, under circumstances likely to produce
27 great bodily harm and death, injure, cause, and permit a child, JOHN
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1 A. DOE, date of birth 6/26/2011, to suffer and to be inflicted with
2 unjustifiable physical pain and mental suffering, and having the
3 care and custody of said child, injure, cause and permit the person
4 and health of said child to be injured and did willfully cause and
5 permit said child to be placed in such situation that his/her person
6 and health was endangered.
7

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9 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

10 It is further alleged that in the commission and attempted
11 commission of the above offense, the said defendant(s), DOROTHY MAY
12 BELL personally used a deadly and dangerous weapon(s), to wit: A
13 KNIFE, said use not being an element of the above offense, within
14 the meaning of Penal Code Section 12022(b).
15

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

20
21 **COUNT 22: FALSE IMPRISONMENT PC.236**

22 On or about November 28, 2020, in the County of San Joaquin,
23 California, DOROTHY MAY BELL, did commit the crime of FALSE
24 IMPRISONMENT, in violation of Section 236 of the Penal Code, a
25 FELONY, who at the time and place last aforesaid, did willfully and
26 unlawfully violate the personal liberty of JOHN M. DOE.
27
28

1 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

2 It is further alleged that in the commission and attempted
3 commission of the above offense, the said defendant(s), DOROTHY MAY
4 BELL personally used a deadly and dangerous weapon(s), to wit: A
5 KNIFE, said use not being an element of the above offense, within
6 the meaning of Penal Code Section 12022(b).
7

8
9 For a further and separate cause of complaint, being a different
10 offense from but connected in its commission with the charge(s)
11 above, complainant further complains and says:
12

13 **COUNT 23: CRIMINAL THREATS PC.422(a)**

14 On or about November 28, 2020, in the County of San Joaquin,
15 California, DOROTHY MAY BELL, did commit the crime of CRIMINAL
16 THREATS, in violation of Section 422(a) of the Penal Code, a FELONY,
17 who at the time and place last aforesaid, did willfully and
18 unlawfully threaten to commit a crime which would result in death or
19 great bodily injury to another, to-wit: JOHN M. DOE with the
20 specific intent that the statement be taken as a threat. It is
21 further alleged that the threatened crime, on its face and under the
22 circumstances in which it was made, was so unequivocal,
23 unconditional, immediate and specific as to convey to said victim a
24 gravity of purpose and an immediate prospect of execution. It is
25 further alleged that the said victim was reasonably in sustained
26 fear of his or her safety and the safety of his or her immediate
27
28

1 family.

2
3 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

4 It is further alleged that in the commission and attempted
5 commission of the above offense, the said defendant(s), DOROTHY MAY
6 BELL personally used a deadly and dangerous weapon(s), to wit: A
7 KNIFE, said use not being an element of the above offense, within
8 the meaning of Penal Code Section 12022(b).
9

10
11 For a further and separate cause of complaint, being a different
12 offense from but connected in its commission with the charge(s)
13 above, complainant further complains and says:
14

15 **COUNT 24: ASSAULT WITH DEADLY WEAPON; NOT FIREARM PC.245(A)(1)**

16 On or about November 28, 2020, in the County of San Joaquin,
17 California, DOROTHY MAY BELL, did commit the crime of ASSAULT WITH A
18 DEADLY WEAPON; NOT FIREARM, in violation of Section 245(a)(1) of the
19 Penal Code, a FELONY, who at the time and place last aforesaid, did
20 willfully and unlawfully commit an assault upon JOHN M. DOE with a
21 deadly weapon or instrument other than a firearm, to-wit: A KNIFE.
22

23
24 For a further and separate cause of complaint, being a different
25 offense from but connected in its commission with the charge(s)
26 above, complainant further complains and says:
27
28

1 **COUNT 25: ASSAULT WITH FORCE LIKELY TO PRODUCE GBI PC.245(a)(4)**

2 On or about November 28, 2020, in the County of San Joaquin,
3 California, DOROTHY MAY BELL, did commit the crime of ASSAULT WITH
4 FORCE LIKELY TO PRODUCE GREAT BODILY INJURY, in violation of Section
5 245(a)(4) of the Penal Code, a FELONY, who at the time and place
6 last aforesaid, did willfully and unlawfully commit an assault upon
7 JOHN M. DOE by means of force likely to produce great bodily injury.
8

9
10 For a further and separate cause of complaint, being a different
11 offense from but connected in its commission with the charge(s)
12 above, complainant further complains and says:
13

14 **COUNT 26: FALSE IMPRISONMENT PC.236**

15 On or about November 28, 2020, in the County of San Joaquin,
16 California, DOROTHY MAY BELL, did commit the crime of FALSE
17 IMPRISONMENT, in violation of Section 236 of the Penal Code, a
18 FELONY, who at the time and place last aforesaid, did willfully and
19 unlawfully violate the personal liberty of JANE D. DOE.
20

21
22 **USE OF DEADLY OR DANGEROUS WEAPON PC.12022(B)**

23 It is further alleged that in the commission and attempted
24 commission of the above offense, the said defendant(s), DOROTHY MAY
25 BELL personally used a deadly and dangerous weapon(s), to wit: A
26 KNIFE, said use not being an element of the above offense, within
27
28

1 the meaning of Penal Code Section 12022(b).

2
3 For a further and separate cause of complaint, being a different
4 offense from but connected in its commission with the charge(s)
5 above, complainant further complains and says:
6

7 **COUNT 27: CRUELTY TO CHILD BY ENDANGERING HEALTH PC.273A(B)**

8 On or about November 28, 2020, in the County of San Joaquin,
9 California, DOROTHY MAY BELL, did commit the crime of CRUELTY TO
10 CHILD BY ENDANGERING HEALTH, in violation of Section 273a(b) of the
11 Penal Code, a MISDEMEANOR, who was the person having the care and
12 custody of JANE D. DOE, a child of 16 years, who, under
13 circumstances and conditions other than those likely to produce
14 great bodily harm and death, did willfully and unlawfully cause and
15 permit the person and health of such child to be endangered.
16
17

18
19 For a further and separate cause of complaint, being a different
20 offense from but connected in its commission with the charge(s)
21 above, complainant further complains and says:
22

23 **COUNT 28: FELON/ADDICT POSSESS/ETC FIREARM PC.29800(a)(1)**

24 On or about November 28, 2020, in the County of San Joaquin,
25 California, DOROTHY MAY BELL, did commit the crime of FELON/ADDICT
26 POSSESS/ETC FIREARM, in violation of Section 29800(a)(1) of the
27 Penal Code, a FELONY, who at the time and place last aforesaid, did
28

1 willfully and unlawfully own, purchase, receive or have in his/her
2 possession or under his/her custody or control a firearm, to-wit: A
3 COLT PYTHON, PISTOL REVOLVER, 357 CALIBER, and said defendant having
4 theretofore been duly and legally convicted of a felony or felonies,
5 to-wit: the crime of FELON/ADDICT POSS/ETC FIREARM in violation of
6 Section 29800(A)(1) of the PENAL Code on NOVEMBER 20, 2018 by and
7 before the SUPERIOR Court, County of SAN FRANCISCO, State of
8 CALIFORNIA, COURT CASE #18010482, being addicted to the use of any
9 narcotic drug.
10

11
12 For a further and separate cause of complaint, being a different
13 offense from but connected in its commission with the charge(s)
14 above, complainant further complains and says:
15

16 **COUNT 29: FELON/ADDICT POSSESS/ETC FIREARM PC.29800(a)(1)**
17

18 On or about November 28, 2020, in the County of San Joaquin,
19 California, DOROTHY MAY BELL, did commit the crime of FELON/ADDICT
20 POSSESS/ETC FIREARM, in violation of Section 29800(a)(1) of the
21 Penal Code, a FELONY, who at the time and place last aforesaid, did
22 willfully and unlawfully own, purchase, receive or have in his/her
23 possession or under his/her custody or control a firearm, to-wit: A
24 SPRINGFIELD ARMORY 1911 SEMI-AUTOMATIC PISTOL, and said defendant
25 having theretofore been duly and legally convicted of a felony or
26 felonies, to-wit: the crime of FELON/ADDICT POSS/ETC FIREARM in
27 violation of Section 29800(A)(1) of the PENAL Code on NOVEMBER 20,
28

1 2018 by and before the SUPERIOR Court, County of SAN FRANCISCO,
2 State of CALIFORNIA, COURT CASE #18010482, being addicted to the use
3 of any narcotic drug.

4
5 For a further and separate cause of complaint, being a different
6 offense from but connected in its commission with the charge(s)
7 above, complainant further complains and says:

8
9
10 **COUNT 30: FELON/ADDICT POSSESS/ETC FIREARM PC.29800(a)(1)**

11 On or about November 28, 2020, in the County of San Joaquin,
12 California, DOROTHY MAY BELL, did commit the crime of FELON/ADDICT
13 POSSESS/ETC FIREARM, in violation of Section 29800(a)(1) of the
14 Penal Code, a FELONY, who at the time and place last aforesaid, did
15 willfully and unlawfully own, purchase, receive or have in his/her
16 possession or under his/her custody or control a firearm, to-wit: A
17 BLACK SHORT BARREL SEMI-AUTOMATIC AR RIFLE, and said defendant
18 having theretofore been duly and legally convicted of a felony or
19 felonies, to-wit: the crime of FELON/ADDICT POSS/ETC FIREARM in
20 violation of Section 29800(A)(1) of the PENAL Code on NOVEMBER 20,
21 2018 by and before the SUPERIOR Court, County of SAN FRANCISCO,
22 State of CALIFORNIA, COURT CASE #18010482, being addicted to the use
23 of any narcotic drug.
24

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26 ///

1 For a further and separate cause of complaint, being a different
2 offense from but connected in its commission with the charge(s)
3 above, complainant further complains and says:
4

5 **COUNT 31: FELON/ADDICT POSSESS/ETC FIREARM PC.29800(a)(1)**

6 On or about November 28, 2020, in the County of San Joaquin,
7 California, DOROTHY MAY BELL, did commit the crime of FELON/ADDICT
8 POSSESS/ETC FIREARM, in violation of Section 29800(a)(1) of the
9 Penal Code, a FELONY, who at the time and place last aforesaid, did
10 willfully and unlawfully own, purchase, receive or have in his/her
11 possession or under his/her custody or control a firearm, to-wit: A
12 BLACK and STAINLESS SHORT BARREL SEMI-AUTOMATIC AR RIFLE, and said
13 defendant having theretofore been duly and legally convicted of a
14 felony or felonies, to-wit: the crime of FELON/ADDICT POSS/ETC
15 FIREARM in violation of Section 29800(A)(1) of the PENAL Code on
16 NOVEMBER 20, 2018 by and before the SUPERIOR Court, County of SAN
17 FRANCISCO, State of CALIFORNIA, COURT CASE #18010482, being addicted
18 to the use of any narcotic drug.
19
20
21

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

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27 ///

1 **COUNT 32: POSSESSION OF A SHORT-BARRELLED RIFLE OR SHOTGUN PC.33210**

2 On or about November 28, 2020, in the County of San Joaquin,
3 California, DOROTHY MAY BELL, did commit the crime of POSSESSION OF
4 A SHORT-BARRELLED RIFLE OR SHOTGUN, in violation of Section 33210 of
5 the Penal Code, a FELONY, who at the time and place last aforesaid,
6 did unlawfully manufacture, cause to be manufactured, import into
7 the State of California, keep for sale, offer and expose for sale,
8 and give, lend, and possess an instrument and weapon of the kind
9 commonly known as a short barreled rifle and a short-barreled
10 shotgun.
11

12
13 For a further and separate cause of complaint, being a different
14 offense from but connected in its commission with the charge(s)
15 above, complainant further complains and says:
16

17 **COUNT 33: POSSESSION OF A SHORT-BARRELLED RIFLE OR SHOTGUN PC.33210**

18 On or about November 28, 2020, in the County of San Joaquin,
19 California, DOROTHY MAY BELL, did commit the crime of POSSESSION OF
20 A SHORT-BARRELLED RIFLE OR SHOTGUN, in violation of Section 33210 of
21 the Penal Code, a FELONY, who at the time and place last aforesaid,
22 did unlawfully manufacture, cause to be manufactured, import into
23 the State of California, keep for sale, offer and expose for sale,
24 and give, lend, and possess an instrument and weapon of the kind
25 commonly known as a short barreled rifle and a short-barreled
26 shotgun.
27
28

1 For a further and separate cause of complaint, being a different
2 offense from but connected in its commission with the charge(s)
3 above, complainant further complains and says:
4

5 **COUNT 34: POSSESSION OF AMMUNITION PC.30305(a)(1)**

6 On or about November 28, 2020, in the County of San Joaquin,
7 California, DOROTHY MAY BELL, did commit the crime of POSSESSION OF
8 AMMUNITION, in violation of Section 30305(a)(1) of the Penal Code, a
9 FELONY, who at the time and place last aforesaid, did unlawfully
10 sell, own, possess and have under control ammunition and reloaded
11 ammunition. It is further alleged that the defendant is prohibited
12 from owning or possessing a firearm pursuant to sections 29800 et.
13 seq. and 29900 et. seq. of the Penal Code and sections 8100 and 8103
14 of the Welfare and Institutions Code, having been previously
15 convicted of the following offense(s): FELON/ADDICT POSS/ETC
16 FIREARM, in violation of Section 29800(A)(1) of the PENAL Code on
17 NOVEMBER 20, 2018 by and before the SUPERIOR Court, County of SAN
18 FRANCISCO, Court Case #18010482.
19
20
21

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

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27 ///

1 **COUNT 35: POSS NARC CONTR SUBST-SALE HS.11351**

2 On or about November 28, 2020, in the County of San Joaquin,
3 California, DOROTHY MAY BELL, did commit the crime of POSSESSION FOR
4 SALE OF A CONTROLLED SUSTANCE, in violation of Section 11351 of the
5 Health and Safety Code, a FELONY, who at the time and place last
6 aforesaid, did willfully and unlawfully possess for sale and
7 purchase for sale a controlled substance, to-wit: HEROIN.
8

9
10 For a further and separate cause of complaint, being a different
11 offense from but connected in its commission with the charge(s)
12 above, complainant further complains and says:
13

14 **COUNT 36: POSS FIREARM and CONTRLED SUBS HS.11370.1(A)**

15 On or about November 28, 2020, in the County of San Joaquin,
16 California, DOROTHY MAY BELL, did commit the crime of POSSESSION OF
17 A CONTROLLED SUBSTANCE WITH LOADED, OPERABLE FIREARM, in violation
18 of Section 11370.1(a) of the Health and Safety Code, a FELONY, who
19 at the time and place last aforesaid did willfully and unlawfully
20 possess a substance containing cocaine base or a substance
21 containing cocaine, or a substance containing heroin, or a substance
22 containing methamphetamine, or a substance containing phencyclidine,
23 while in the immediate personal possession of a loaded, operable
24 firearm, to wit: HEROIN.
25
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28

1 For a further and separate cause of complaint, being a different
2 offense from but connected in its commission with the charge(s)
3 above, complainant further complains and says:
4

5 **COUNT 37: ASSAULT WITH DEADLY WEAPON; NOT FIREARM PC.245(A)(1)**

6 On or about September 3, 2020 - September 8, 2020, in the County of
7 San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
8 ASSAULT WITH A DEADLY WEAPON; NOT FIREARM, in violation of Section
9 245(a)(1) of the Penal Code, a FELONY, who at the time and place
10 last aforesaid, did willfully and unlawfully commit an assault upon
11 JANE S. DOE with a deadly weapon or instrument other than a firearm,
12 to-wit: WOODEN POLE AND KNIFE.
13

14
15 **INFLICTION OF GREAT BODILY INJURY PC.12022.7(A)**

16 It is further alleged that in the commission of the above offense
17 the said defendant(s), DOROTHY MAY BELL, personally inflicted great
18 bodily injury upon JANE S. DOE, not an accomplice to the above
19 offense, within the meaning of Penal Code Section 12022.7 and also
20 causing the above offense to be a serious felony within the meaning
21 of Penal Code Section 1192.7(c)(8).
22

23
24 **PERSONAL USE OF NON-FIREARM WEAPON PC.12022(B)(1)**

25 It is further alleged that in the commission or attempted commission
26 of the above offense, the defendant, DOROTHY MAY BELL, did
27 personally use a weapon, to-wit: KNIFE and WOODEN POLE, within the
28

1 meaning of Penal Code Section 12022(b)(1).

2
3 For a further and separate cause of complaint, being a different
4 offense from but connected in its commission with the charge(s)
5 above, complainant further complains and says:
6

7 **COUNT 38: CORPORAL INJURY TO SPOUSE/COHABITANT/PARENT OF CHILD**
8 **PC.273.5(A)**
9

10 On or about September 3, 2020 - September 8, 2020, in the County of
11 San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
12 CORPORAL INJURY TO SPOUSE/FORMER SPOUSE, COHABITANT/FORMER
13 COHABITANT, FIANCE/FORMER ENGAGEMENT RELATIONSHIP, DATING/FORMER
14 DATING RELATIONSHIP, PARENT OF CHILD, in violation of Section
15 273.5(A), a FELONY, who at the time and place last aforesaid, did
16 willfully and unlawfully inflict a corporal injury resulting in a
17 traumatic condition upon JANE S. DOE, who was then and there the
18 spouse/former spouse, cohabitant/former cohabitant, fiancé/former
19 engagement relationship, dating/former dating relationship or parent
20 of child of the defendant.
21

22
23 **INFLICTION OF GREAT BODILY INJURY PC.12022.7(A)**

24 It is further alleged that in the commission of the above offense
25 the said defendant(s), DOROTHY MAY BELL, personally inflicted great
26 bodily injury upon JANE S. DOE, not an accomplice to the above
27 offense, within the meaning of Penal Code Section 12022.7 and also
28

1 causing the above offense to be a serious felony within the meaning
2 of Penal Code Section 1192.7(c)(8).

3
4 **PERSONAL USE OF NON-FIREARM WEAPON PC.12022(B)(1)**

5 It is further alleged that in the commission or attempted commission
6 of the above offense, the defendant, DOROTHY MAY BELL, did
7 personally use a weapon, to-wit: KNIFE and WOODEN POLE, within the
8 meaning of Penal Code Section 12022(b)(1).
9

10
11 For a further and separate cause of complaint, being a different
12 offense from but connected in its commission with the charge(s)
13 above, complainant further complains and says:
14

15 **COUNT 39: FALSE IMPRISONMENT PC.236**

16 On or about September 3, 2020 - September 8, 2020, in the County of
17 San Joaquin, California, DOROTHY MAY BELL, did commit the crime of
18 FALSE IMPRISONMENT, in violation of Section 236 of the Penal Code, a
19 FELONY, who at the time and place last aforesaid, did willfully and
20 unlawfully violate the personal liberty of JANE S. DOE.
21

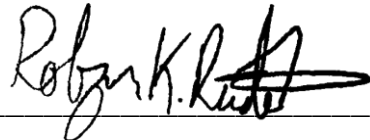
22
23 If the above-named defendant(s) is/are presently on probation in San
24 Joaquin County, any evidence presented at a preliminary hearing in
25 the instant case will be used not only as a basis for a holding
26 order in this case but also as evidence of a violation of probation
27 and, at any formal hearing on that violation of probation, the
28

1 People will move the transcript of the preliminary hearing into
2 evidence as a basis for the violation.

3
4 Pursuant to Penal Code Section 1054.5(b), the People hereby
5 informally request that the defendant and his/her attorney disclose
6 to the People all information and materials described in Penal Code
7 Section 1054.3.
8

9
10 I declare under penalty of perjury that the foregoing is true and
11 correct except for those things stated on information and belief and
12 those I believe to be true.
13

14 Executed on 12/2/2020, at Stockton, California.
15

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