

IN CUSTODY

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

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,  
v.  
CHARLES ANDREW WILLIAMS,  
*dob 02/08/86;*  
Defendant

CT No. CE211823  
DA No. MAD314

COMPLAINT-FELONY

INFORMATION

Date: \_\_\_\_\_

**CHARGE SUMMARY**

<u>Count</u>	<u>Charge</u>	<u>Issue Type</u>	<u>Sentence Range</u>	<u>Special Allegations</u>	<u>Allegation Effect</u>
1	PC187(a) WILLIAMS, CHARLES ANDREW	Felony	25 Yrs-Life	PC12022.53(d) PC12022.5(a)(1) PC190.2(a)(15) PC190.2(a)(3) WI602(b)	+25 Yrs-Life +3-4-10 +25 Yrs-Life +25 Yrs-Life
2	PC187(a) WILLIAMS, CHARLES ANDREW	Felony	25 Yrs-Life	PC12022.53(d) PC12022.5(a)(1) PC190.2(a)(15) PC190.2(a)(3) WI602(b)	+25 Yrs-Life +3-4-10 +25 Yrs-Life +25 Yrs-Life
3	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10

## CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
4	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10
5	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10
6	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10
7	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10
8	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10

## CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
9	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10
10	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10
11	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10
12	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10
13	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10

## CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
14	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10
15	PC664\PC187(a) WILLIAMS, CHARLES ANDREW	Felony	Life W Parole	PC189 WI707(d)(2) PC12022.7(a) PC12022.53(d) PC12022.53(c) PC12022.5(a)(1)	+3 Yrs +25 Yrs-Life +20 Yrs +3-4-10
16	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs
17	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs
18	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs
19	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs
20	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs

## CHARGE SUMMARY (cont'd)

<u>Count</u>	<u>Charge</u>	<u>Issue Type</u>	<u>Sentence Range</u>	<u>Special Allegations</u>	<u>Allegation Effect</u>
21	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs
22	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs
23	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs
24	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs
25	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs
26	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs
27	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs
28	PC245(a)(2) WILLIAMS, CHARLES ANDREW	Felony	Check Code	WI707(d)(2) PC12022.5(a)(1) PC12022.7(a)	+3-4-10 +3 Yrs

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 - MURDER

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully murder BRYAN ZUCKOR, a human being, in violation of PENAL CODE SECTION 187(a).

And it is further alleged that in the commission and attempted commission of the above offense, the defendant CHARLES ANDREW WILLIAMS intentionally and personally discharged a firearm, to wit: a revolver, 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 it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

#### SPECIAL CIRCUMSTANCE

And it is further alleged that the murder of BRYAN ZUCKOR was committed by defendant CHARLES ANDREW WILLIAMS and that the defendant intentionally killed the victim by means of lying in wait, within the meaning of PENAL CODE SECTION 190.2(a)(15).

#### SPECIAL CIRCUMSTANCE AS TO COUNTS 1 AND 2.

And it is further alleged against the defendant, CHARLES ANDREW WILLIAMS, that he has in this proceeding been convicted of more than one offense of murder in the first or second degree, within the meaning of PENAL CODE SECTION 190.2(a)(3).

It is further alleged that the defendant, CHARLES ANDREW WILLIAMS, was 14 years of age and older at the time the defendant committed the above offense, and the defendant personally killed the victim and that a special circumstance enumerated in subdivision (a) of Penal section 190.2 is alleged. pursuant to WELFARE AND INSTITUTIONS CODE SECTION 602(b).

### COUNT 2 - MURDER

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully murder RANDY KERCHNER GORDON, a human being, in violation of PENAL CODE SECTION 187(a).

And it is further alleged that in the commission and attempted commission of the above offense, the defendant CHARLES ANDREW WILLIAMS intentionally and personally discharged a firearm, to wit: a revolver, 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).

## **CHARGES (cont'd)**

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **SPECIAL CIRCUMSTANCE**

And it is further alleged that the murder of RANDY KERCHNER GORDON was committed by defendant CHARLES ANDREW WILLIAMS and that the defendant intentionally killed the victim by means of lying in wait, within the meaning of PENAL CODE SECTION 190.2(a)(15).

### **SPECIAL CIRCUMSTANCE AS TO COUNTS 1 AND 2.**

And it is further alleged against the defendant, CHARLES ANDREW WILLIAMS, that he has in this proceeding been convicted of more than one offense of murder in the first or second degree, within the meaning of PENAL CODE SECTION 190.2(a)(3).

It is further alleged that the defendant, CHARLES ANDREW WILLIAMS, was 14 years of age and older at the time the defendant committed the above offense, and the defendant personally killed the victim and that a special circumstance enumerated in subdivision (a) of Penal section 190.2 is alleged. pursuant to WELFARE AND INSTITUTIONS CODE SECTION 602(b).

## **COUNT 3 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder SCOTT MARSHALL, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon SCOTT MARSHALL, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

And it is further alleged that in the commission and attempted commission of the above offense, the defendant CHARLES ANDREW WILLIAMS intentionally and personally discharged a firearm, to wit: a revolver, 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).

## CHARGES (cont'd)

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

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 4 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder TRAVIS TATE-GALLEGOS, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon TRAVIS TATE-GALLEGOS, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

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

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).



## **CHARGES (cont'd)**

### **COUNT 5 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder MELISA McNULTY, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon MELISA McNULTY, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

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

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 6 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder TREVOR EDWARDS, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon TREVOR EDWARDS, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

## CHARGES (cont'd)

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

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 7 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder RAYMOND SERRATO, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon RAYMOND SERRATO, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

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

## CHARGES (cont'd)

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 8 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder HEATHER CRUZ, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon HEATHER CRUZ, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

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

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 9 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder BARRY GIBSON, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

## CHARGES (cont'd)

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon BARRY GIBSON, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

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

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 10 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder JAMES JACKSON, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon JAMES JACKSON, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

And it is further alleged that in the commission and attempted commission of the above offense, the defendant CHARLES ANDREW WILLIAMS intentionally and personally discharged a firearm, to wit: a revolver, 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).

## CHARGES (cont'd)

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

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 11 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder TRISTON SALLADAY, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon TRISTON SALLADAY, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

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

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 12 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder MATTHEW HEIER, a human being, in violation of PENAL CODE SECTION 187(a) and PENAL CODE SECTION 664.

## CHARGES (cont'd)

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

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon MATTHEW HEIER, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

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

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 13 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder KARLA LEYVA, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon KARLA LEYVA, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

## CHARGES (cont'd)

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

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 14 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder TIM ESTES, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon TIM ESTES, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

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

## CHARGES (cont'd)

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 15 - ATTEMPT MURDER, PREMEDITATED ATTEMPTED MURDER, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully attempt to murder PETER RUIZ, 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 willfull, deliberate, and premeditated, within the meaning of PENAL CODE SECTION 189.

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon PETER RUIZ, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

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

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

### **COUNT 16 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon SCOTT MARSHALL with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).



## **CHARGES (cont'd)**

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon SCOTT MARSHALL, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

### **COUNT 17 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon TRAVIS TATE-GALLEGOS with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon TRAVIS TATE-GALLEGOS, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

### **COUNT 18 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon MELISA McNULTY with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

## **CHARGES (cont'd)**

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon MELISA McNULTY, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

### **COUNT 19 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon TREVOR EDWARDS with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon TREVOR EDWARDS, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

### **COUNT 20 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon RAYMOND SERRATO with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon RAYMOND SERRATO, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

## **CHARGES (cont'd)**

### **COUNT 21 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon HEATHER CRUZ with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon HEATHER CRUZ, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

### **COUNT 22 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon BARRY GIBSON with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon BARRY GIBSON, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

### **COUNT 23 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon JAMES JACKSON with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

## **CHARGES (cont'd)**

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon JAMES JACKSON, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

### **COUNT 24 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon TRISTON SALLADAY with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon TRISTON SALLADAY, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

### **COUNT 25 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon MATTHEW HEIER with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

## **CHARGES (cont'd)**

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon MATTHEW HEIER, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

### **COUNT 26 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon KARLA LEYVA with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon KARLA LEYVA, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

### **COUNT 27 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER**

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon TIM ESTES with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon TIM ESTES, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

## CHARGES (cont'd)

### COUNT 28 - ASSAULT WITH A FIREARM, 14 YEARS OF AGE OR OLDER

On or about March 5, 2001, CHARLES ANDREW WILLIAMS did unlawfully commit an assault upon PETER RUIZ with a firearm, in violation of PENAL CODE SECTION 245(a)(2).

And it is further alleged that the defendant CHARLES ANDREW WILLIAMS was 14 years of age or older when he/she committed the above offense(s), within the meaning of WELFARE AND INSTITUTIONS CODE SECTION 707(d)(2).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally used a firearm, to wit: a revolver, within the meaning of PENAL CODE SECTION 12022.5(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, CHARLES ANDREW WILLIAMS, personally inflicted great bodily injury upon PETER RUIZ, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).



NOTICE: If any of the above-named defendant(s) are presently on probation in San Diego County, any evidence presented at a Preliminary Examination in the instant case will be used not only for a basis for a holding in this case but also as a circumstance for a violation of probation and, at any formal hearing at that violation of probation. The People will move the transcript of the Preliminary Examination into evidence as a basis for the violation and for sentencing purposes.

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.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER CE211823, CONSISTS OF 28 COUNTS.

Executed at El Cajon, County of San Diego, State of California, on March 7, 2001.

\_\_\_\_\_  
COMPLAINANT

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\_\_\_\_\_  
INFORMATION

PAUL J. PFINGST  
District Attorney  
County of San Diego  
State of California  
by:

\_\_\_\_\_  
Date

\_\_\_\_\_  
Deputy District Attorney