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**CONFORMED COPY
ORIGINAL FILED**
Superior Court of California
County of Los Angeles

OCT 05 2020

Sherri R. Carter, Executive Officer/Clerk
By: Tammy Tsou, Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

NAASON JOAQUIN GARCIA (XXXXXX),
ALONDRA OCAMPO (XXXXXX),
SUSANA MEDINA OAXACA (XXXXXX),

Defendants.

Case No. BA484133

FIRST AMENDED INFORMATION

Action Filed: July 30, 2020
Dept.: 101
Judge: Hon. Ronald Coen

THE ATTORNEY GENERAL OF THE STATE OF CALIFORNIA, by this information, accuses the above-named defendants of the following crimes, which are connected to one another in their commission:

COUNT ONE

In or about the period of August 1, 2017, to February 1, 2018, in the County of Los Angeles, defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the

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1 crime of LEWD ACT UPON A CHILD, a violation of PENAL CODE SECTION 288(c)(1), a
2 Felony, in that they did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon
3 and with the body, or any part thereof, of JANE DOE 1, who was 15 years old, with the intent of
4 arousing, appealing to, or gratifying, the lust, passions, or sexual desires of said defendant who
5 was at least 10 years older than JANE DOE 1.

6 **COUNT TWO**

7 In or about the period of August 1, 2017, to February 15, 2018, in the County of Los
8 Angeles, defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the
9 crime of CONSPIRACY, a violation of PENAL CODE SECTION 182(a)(1), a Felony, in that
10 they did unlawfully conspire together to commit the crime of HUMAN TRAFFICKING BY
11 PROCURING A CHILD TO ENGAGE IN A LEWD ACT, a violation of PENAL CODE
12 SECTION 236.1(b)/266j, a Felony, and that pursuant to and for the purpose of carrying out the
13 objectives and purposes of the aforesaid conspiracy, the said defendants committed the following
14 overt acts at and in the County of Los Angeles:

15 **OVERT ACT I**

16 In or about August 2017, in the County of Los Angeles, defendant ALONDRA OCAMPO
17 met with JANE DOE 1, along with other minor members of a La Luz Del Mundo church sub
18 group.

19 **OVERT ACT II**

20 In or about August 2017, in the County of Los Angeles, defendant ALONDRA OCAMPO a
21 group of minor girls that if they went against any desires or wishes of "the Apostle," defendant
22 NAASON JOAQUIN GARCIA, that they were going against god.

23 **OVERT ACT III**

24 In or about September 2017, in the County of Los Angeles, defendant ALONDRA
25 OCAMPO directed JANE DOE 1, along with the other minors, to perform "flirty" dances for
26 defendant NAASON JOAQUIN GARCIA wearing as little clothing as possible.

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OVERT ACT IV

In or about September 2017, in the County of Los Angeles, and after JANE DOE 1 and the other minors completed their September 2017 dance, defendant NAASON JOAQUIN GARCIA gave them a speech about a king having mistresses and stated that an apostle of god can never be judged for his actions.

OVERT ACT V

In or about the period of September 2017 to January 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO directed JANE DOE 1 and other minors to take off their clothing and touch each other sexually.

OVERT ACT VI

In or about the period of September 2017 to January 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO took photos of minor girls touching each other sexually at her direction for the purpose of sending the photographs to defendant NAASON JOAQUIN GARCIA.

OVERT ACT VII

In or about the period of August 2017 to February 1, 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO called JANE DOE 1 to the home of defendant NAASON JOAQUIN GARCIA and asked her to serve him coffee in his office.

OVERT ACT VIII

In or about the period of August 2017 to February 1, 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO walked JANE DOE 1 to the defendant NAASON JOAQUIN GARCIA's office, grabbed the coffee JANE DOE 1 was holding, and told JANE DOE 1 to remove her dress.

OVERT ACT IX

In or about the period of August 2017 to February 1, 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO then returned the coffee to JANE DOE 1.

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1 OVERT ACT X

2 In or about the period of August 2017 to February 1, 2018, in the County of Los Angeles,
3 JANE DOE 1 entered the office and defendant NAASON JOAQUIN GARCIA put his arms
4 around her, kissed her on the lips, touched her buttocks, and attempted to touch her vagina.

5 **COUNT THREE**

6 In or about the period of August 1, 2017, to February 1, 2018, in the County of Los
7 Angeles, defendant ALONDRA OCAMPO committed the crime of HUMAN TRAFFICKING
8 BY PROCURING A CHILD TO ENGAGE IN A LEWD ACT, a violation of PENAL CODE
9 SECTION 236.1(b), a Felony, in that she did willfully and unlawfully deprive and/or violate the
10 personal liberty of JANE DOE 1 with the intent to maintain a violation of PENAL CODE
11 SECTION 266j.

12 **COUNT FOUR**

13 In or about the period of August 1, 2017, to February 1, 2018, in the County of Los
14 Angeles, defendant ALONDRA OCAMPO committed the crime of PROCURING A CHILD TO
15 ENGAGE IN A LEWD ACT, a violation of PENAL CODE SECTION 266j, a Felony, in that she
16 did unlawfully and intentionally provide or make available JANE DOE 1, a child under the age of
17 16 years, to another person for the purpose of a lewd and lascivious act as defined in Penal Code
18 section 288.

19 **COUNT FIVE**

20 In or about the period of September 1, 2017, to February 28, 2018, in the County of Los
21 Angeles, defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the
22 crime of FORCIBLE RAPE OF A MINOR, a violation of PENAL CODE SECTION 261(a)(2), a
23 Felony, in that they did unlawfully accomplish an act of sexual intercourse with a person, to wit
24 JANE DOE 2, not his spouse, against said person's will by means of force, violence, duress,
25 menace, or fear of immediate and unlawful bodily injury on said person or another.

26 It is further alleged that in the commission of the above offense the said defendants
27 personally inflicted great bodily injury upon JANE DOE 2, not an accomplice to the above
28 offense, within the meaning of Penal Code section 12022.7(a) and also causing the above offense

1 to become a serious felony within the meaning of Penal Code section 1192.7(c)(8) and a violent
2 felony within the meaning of Penal Code section 667.5(c)(8).

3 **COUNT SIX**

4 In or about the period of September 1, 2017, to February 28, 2018, in the County of Los
5 Angeles, defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the
6 crime of UNLAWFUL SEXUAL INTERCOURSE, a violation of PENAL CODE SECTION
7 261.5(c), a Felony, in that they engaged in an act of unlawful sexual intercourse with JANE DOE
8 2, a minor not the spouse of the defendant, and the minor being more than three years younger
9 than the defendants.

10 It is further alleged that in the commission of the above offense the said defendants
11 personally inflicted great bodily injury upon JANE DOE 2, not an accomplice to the above
12 offense, within the meaning of Penal Code section 12022.7(a) and also causing the above offense
13 to become a serious felony within the meaning of Penal Code section 1192.7(c)(8) and a violent
14 felony within the meaning of Penal Code section 667.5(c)(8).

15 **COUNT SEVEN**

16 In or about the period of September 1, 2017, to February 28, 2018, in the County of Los
17 Angeles, defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the
18 crime of FORCIBLE ORAL COPULATION, a violation of PENAL CODE SECTION
19 287(c)(2)(C), a Felony, in that they did unlawfully accomplish and act of oral copulation with a
20 person, to wit JANE DOE 2, against said person's will by means of force, violence, duress,
21 menace, or fear of immediate and unlawful bodily injury on said person or another.

22 **COUNT EIGHT**

23 In or about the period of September 1, 2017, to February 28, 2018, in the County of Los
24 Angeles, defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the
25 crime of ORAL COPULATION OF A PERSON UNDER 18, a violation of PENAL CODE
26 SECTION 287(b)(1), a Felony, in that they did unlawfully participate in an act of oral copulation
27 with JANE DOE 2, a person under the age of 18 years.

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1 **COUNT NINE**

2 In or about the period of January 1, 2017, to February 28, 2018, in the County of Los
3 Angeles, defendants NAASON JOAQUIN GARCIA, ALONDRA OCAMPO, and SUSANA
4 MEDINA OAXACA committed the crime of FORCIBLE ORAL COPULATION OF A
5 PERSON UNDER 18, a violation of PENAL CODE SECTION 287(c)(2)(C), a Felony, in that
6 they did unlawfully accomplish an act of oral copulation with a person, to wit JANE DOE 3,
7 against said person`s will by means of force, violence, duress, menace, or fear of immediate and
8 unlawful bodily injury on said person or another.

9 **COUNT TEN**

10 In or about the period of January 1, 2017, to February 28, 2018, in the County of Los
11 Angeles, defendants NAASON JOAQUIN GARCIA, ALONDRA OCAMPO, and SUSANA
12 MEDINA OAXACA committed the crime of ORAL COPULATION OF A PERSON UNDER
13 18, a violation of PENAL CODE SECTION 287(b)(1), a Felony, in that they did unlawfully
14 participate in an act of oral copulation with JANE DOE 3, a person under the age of 18 years.

15 **COUNT ELEVEN**

16 In or about the period of August 1, 2017, to April 30, 2018, in the County of Los Angeles,
17 defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the crime of
18 CONSPIRACY, a violation of PENAL CODE SECTION 182(a)(1), a Felony, in that they did
19 unlawfully conspire together to commit the crime of HUMAN TRAFFICKING FOR
20 PRODUCTION OF CHILD PORNOGRAPHY, a violation of PENAL CODE SECTION
21 236.1(b))/311.2(c), a Felony, and that pursuant to and for the purpose of carrying out the
22 objectives and purposes of the aforesaid conspiracy, the said defendants committed the following
23 overt acts at and in the County of Los Angeles:

24 **OVERT ACT I**

25 In or about the period of September 1, 2017, to January 31, 2018, in the County of Los
26 Angeles, defendant ALONDRA OCAMPO sent a message to JANE DOE 1, JANE DOE 2, and
27 JANE DOE 3 saying that defendant NAASON JOAQUIN GARICA [“the servant of god”] would
28 be really happy if they sent OCAMPO nude photos for NAASON JOAQUIN GARICA.

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OVERT ACT II

In or about the period of September 1, 2017, to January 31, 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO sent a message to JANE DOE 1, JANE DOE 2, and JANE DOE 3 telling them to take photos without their underwear and with their legs open, and to send the photos to her.

OVERT ACT III

In or about the period of September 1, 2017, to January 31, 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO took JANE DOE 1, JANE DOE 2, and JANE DOE 3 to an unknown office building, provided them with school girl outfits, directed them to touch their own breasts and buttocks, as well as each other's, and took photos of them doing so.

OVERT ACT IV

In or about December 2017, in the County of Los Angeles, defendant ALONDRA OCAMPO took JANE DOE 1, JANE DOE 2, and JANE DOE 3 to defendant NAASON JOAQUIN GARCIA'S home and told them to remove their clothing.

OVERT ACT V

In or about December 2017, in the County of Los Angeles, defendant ALONDRA OCAMPO had JANE DOE 1, JANE DOE 2, and JANE DOE 3 touch each other's breasts and vaginas for photos, and directed them to open their legs so she could take photos of their vaginal areas.

OVERT ACT VI

In or about January 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO took JANE DOE 1, JANE DOE 2, and JANE DOE 3 to a hotel.

OVERT ACT VII

In or about January 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO had JANE DOE 1, JANE DOE 2, and JANE DOE 3 take off their clothing, touch each other's breasts and vaginas, and lick whipped cream off each other's breasts.

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OVERT ACT VIII

In or about 2017 and 2018, in the county of Los Angeles, defendant ALONDRA OCAMPO told JANE DOE 1, JANE DOE 2, and JANE DOE 3 that the photos she took of them were for defendant NAASON JOAQUIN GARCIA [“the servant of god”].

OVERT ACT IX

In or about 2017 and 2018, on at least one occasion, in the County of Los Angeles, defendant NAASON JOAQUIN GARCIA thanked JANE DOE 1, JANE DOE 2, and JANE DOE 3 for the photos he received of them.

COUNT TWELVE

In or about the period of August 1, 2017, to February 28, 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO committed the crime of HUMAN TRAFFICKING FOR PRODUCTION OF CHILD PORNOGRAPHY, a violation of PENAL CODE SECTION 236.1(b), a Felony, in that she did willfully and unlawfully deprive and/or violate the personal liberty of JANE DOE 1 with the intent to maintain a violation of PENAL CODE SECTION 311.2(c).

COUNT THIRTEEN

In or about the period of August 1, 2017, to February 28, 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO committed the crime of HUMAN TRAFFICKING FOR PRODUCTION OF CHILD PORNOGRAPHY, a violation of PENAL CODE SECTION 236.1(b), a Felony, in that she did willfully and unlawfully deprive and/or violate the personal liberty of JANE DOE 2 with the intent to maintain a violation of PENAL CODE SECTION 311.2(c).

COUNT FOURTEEN

In or about the period of August 1, 2017, to February 28, 2018, in the County of Los Angeles, defendant ALONDRA OCAMPO committed the crime of HUMAN TRAFFICKING FOR PRODUCTION OF CHILD PORNOGRAPHY, a violation of PENAL CODE SECTION 236.1(b), a Felony, in that she did willfully and unlawfully deprive and/or violate the personal

1 liberty of JANE DOE 3 with the intent to maintain a violation of PENAL CODE SECTION
2 311.2(c).

3 **COUNT FIFTEEN**

4 In or about the period of August 1, 2017, to February 28, 2018, in the County of Los
5 Angeles, defendant ALONDRA OCAMPO committed the crime of
6 PRODUCTION/DISTRIBUTION OF CHILD PORNOGRAPHY, in violation of PENAL CODE
7 SECTION 311.2(c), in that she did unlawfully and knowingly send or cause to be sent, and in the
8 State of California did possess, prepare, public, produce, photographs and video, with the intent to
9 distribute, exhibit to, or exchange with a person 18 years of age and older, knowing that the
10 matter depicted a person under the age of 18 years personally engaging in and personally
11 simulating sexual conduct as defined in Penal Code section 311.4.

12 **COUNT SIXTEEN**

13 In or about the period of August 1, 2017, to February 28, 2018, in the County of Los
14 Angeles, defendant ALONDRA OCAMPO committed the crime of EXTORTION, a violation of
15 PENAL CODE SECTION 518, a Felony, in that she extorted property or other consideration
16 from JANE DOE 1 by means of force and threat such as is mentioned in Section 519.

17 **COUNT SEVENTEEN**

18 In or about the period of August 1, 2017, to February 28, 2018, in the County of Los
19 Angeles, defendant ALONDRA OCAMPO committed the crime of EXTORTION, a violation of
20 PENAL CODE SECTION 518, a Felony, in that she extorted property or other consideration
21 from JANE DOE 2 by means of force and threat such as is mentioned in Section 519.

22 **COUNT EIGHTEEN**

23 In or about the period of September 1, 2017, to February 28, 2018, in the County of Los
24 Angeles, defendant ALONDRA OCAMPO committed the crime of EXTORTION, a violation of
25 PENAL CODE SECTION 518, a Felony, in that she extorted property or other consideration
26 from JANE DOE 3 by means of force and threat such as is mentioned in Section 519.

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1 **COUNT NINETEEN**

2 In or about the period of August 1, 2017, to February 28, 2018, in the County of Los
3 Angeles, defendant ALONDRA OCAMPO committed the crime of CONTACT WITH MINOR
4 FOR SEXUAL OFFENSE, in violation of PENAL CODE SECTION 288.3(a), in that she did
5 unlawfully contact and communicate with a minor, JANE DOE 1, knowing that JANE DOE 1
6 was a minor, with the intent to commit an offense specified in Penal Code section 261, 289, or
7 311.2 involving JANE DOE 1.

8 **COUNT TWENTY**

9 In or about the period of August 1, 2017, to February 28, 2018, in the County of Los
10 Angeles, defendant ALONDRA OCAMPO committed the crime of CONTACT WITH MINOR
11 FOR SEXUAL OFFENSE, in violation of PENAL CODE SECTION 288.3(a), in that she did
12 unlawfully contact and communicate with a minor, JANE DOE 2, knowing that JANE DOE 2
13 was a minor, with the intent to commit an offense specified in Penal Code section 261, 289, or
14 311.2 involving JANE DOE 2.

15 **COUNT TWENTY-ONE**

16 In or about the period of August 1, 2017, to February 28, 2018, in the County of Los
17 Angeles, defendant ALONDRA OCAMPO committed the crime of CONTACT WITH MINOR
18 FOR SEXUAL OFFENSE, in violation of PENAL CODE SECTION 288.3(a), in that she did
19 unlawfully contact and communicate with a minor, JANE DOE 3, knowing that JANE DOE 3
20 was a minor, with the intent to commit an offense specified in Penal Code section 261, 289, or
21 311.2 involving JANE DOE 3.

22 **COUNT TWENTY-TWO**

23 In or about the period of June 1, 2015, to July 30, 2015, in the County of Los Angeles,
24 defendant NAASON JOAQUIN GARCIA committed the crime of FORCIBLE RAPE, a violation
25 of PENAL CODE SECTION 261(a)(2), a Felony, in that he did unlawfully accomplish an act of
26 sexual intercourse with a person, to wit JANE DOE 4, not his spouse, against said person's will
27 by means of force, violence, duress, menace, or fear of immediate and unlawful bodily injury on
28 said person or another.

1 **COUNT TWENTY-THREE**

2 In or about the period of June 1, 2015, to July 30, 2015, in the County of Los Angeles,
3 defendant NAASON JOAQUIN GARCIA committed the crime of FORCIBLE ORAL
4 COPULATION, a violation of PENAL CODE SECTION 287(c)(2)(A), a Felony, in that he did
5 unlawfully accomplish and act of oral copulation with a person, to wit JANE DOE 4, against said
6 person's will by means of force, violence, duress, menace, or fear of immediate and unlawful
7 bodily injury on said person or another.

8 **COUNT TWENTY-FOUR**

9 In or about the period of March 1, 2017, to September 15, 2017, in the County of Los
10 Angeles, defendant NAASON JOAQUIN GARCIA committed the crime of FORCIBLE RAPE, a
11 violation of PENAL CODE SECTION 261(a)(2), a Felony, in that he did unlawfully accomplish
12 an act of sexual intercourse with a person, to wit JANE DOE 4, not his spouse, against said
13 person's will by means of force, violence, duress, menace, or fear of immediate and unlawful
14 bodily injury on said person or another.

15 **COUNT TWENTY-FIVE**

16 In or about the period of March 1, 2017, to September 15, 2017, in the County of Los
17 Angeles, defendant NAASON JOAQUIN GARCIA committed the crime of FORCIBLE ORAL
18 COPULATION, a violation of PENAL CODE SECTION 287(c)(2)(A), a Felony, in that he did
19 unlawfully accomplish an act of oral copulation with a person, to wit JANE DOE 4, against said
20 person's will by means of force, violence, duress, menace, or fear of immediate and unlawful
21 bodily injury on said person or another.

22 **COUNT TWENTY-SIX**

23 In or about the period of March 1, 2017, to September 15, 2017, in the County of Los
24 Angeles, defendant NAASON JOAQUIN GARCIA committed the crime of EXTORTION, a
25 violation of PENAL CODE SECTION 518, a Felony, in that he extorted property or other
26 consideration from JANE DOE 4, by means of force and threat such as is mentioned in Section
27 519.

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1 **COUNT TWENTY-SEVEN**

2 On June 3, 2019, in the County of Los Angeles, defendant NAASON JOAQUIN GARCIA,
3 committed the crime of POSSESSION OF CHILD PORNOGRAPHY in violation of PENAL
4 CODE SECTION 311.11(a), a felony, in that he did knowingly possess and control an image, the
5 production of which involved the use of a person under the age of 18 years, knowing that the
6 matter depicted a person under the age of 18 years personally engaging in and simulating sexual
7 conduct as defined in Penal Code Section 311.4(d).

8 **COUNT TWENTY-EIGHT**

9 In or about the period of February 1, 2016, to February 28, 2016, in the County of Los
10 Angeles, defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the
11 crime of FORCIBLE RAPE, a violation of PENAL CODE SECTION 261(a)(2), a Felony, in that
12 they did unlawfully accomplish an act of sexual intercourse with a person, to wit JANE DOE 5,
13 not his spouse, against said person's will by means of force, violence, duress, menace, or fear of
14 immediate and unlawful bodily injury on said person or another.

15 **COUNT TWENTY-NINE**

16 In or about the period of February 1, 2016, to February 28, 2016, in the County of Los
17 Angeles, defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the
18 crime of FORCIBLE ORAL COPULATION, a violation of PENAL CODE SECTION
19 287(c)(2)(A), a Felony, in that they did unlawfully accomplish an act of oral copulation with a
20 person, to wit JANE DOE 5, against said person's will by means of force, violence, duress,
21 menace, or fear of immediate and unlawful bodily injury on said person or another.

22 **COUNT THIRTY**

23 In or about the period of February 1, 2016, to February 28, 2016, in the County of Los
24 Angeles, defendant NAASON JOAQUIN GARCIA committed the crime of EXTORTION, a
25 violation of PENAL CODE SECTION 518, a Felony, in that he extorted property or other
26 consideration from JANE DOE 5, by means of force and threat such as is mentioned in Section
27 519.

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1 **COUNT THIRTY-ONE**

2 In or about the period of May 1, 2016, to September 30, 2016, in the County of Los
3 Angeles, defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the
4 crime of FORCIBLE RAPE, a violation of PENAL CODE SECTION 261(a)(2), a Felony, in that
5 they did unlawfully accomplish an act of sexual intercourse with a person, to wit JANE DOE 5,
6 not his spouse, against said person's will by means of force, violence, duress, menace, or fear of
7 immediate and unlawful bodily injury on said person or another.

8 **COUNT THIRTY-TWO**

9 In or about the period of May 1, 2016, to September 30, 2016, in the County of Los
10 Angeles, defendant NAASON JOAQUIN GARCIA committed the crime of EXTORTION, a
11 violation of PENAL CODE SECTION 518, a Felony, in that he extorted property or other
12 consideration from JANE DOE 5, by means of force and threat such as is mentioned in Section
13 519.

14 **COUNT THIRTY-THREE**

15 In or about the period of September 1, 2016, to October 31, 2016, in the County of Los
16 Angeles, defendant ALONDRA OCAMPO committed the crime of FORCIBLE SEXUAL
17 PENETRATION, a violation of PENAL CODE SECTION 289(a)(1)(A), a Felony, in that she did
18 unlawfully accomplish an act of sexual penetration against the will of JANE DOE 5 by means of
19 force, violence, duress, menace, or fear of immediate and unlawful bodily injury on JANE DOE
20 5.

21 **COUNT THIRTY-FOUR**

22 In or about the period of October 1, 2017, to November 30, 2017, in the County of Los
23 Angeles, defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the
24 crime of FORCIBLE RAPE, a violation of PENAL CODE SECTION 261(a)(2), a Felony, in that
25 they did unlawfully accomplish an act of sexual intercourse with a person, to wit JANE DOE 5,
26 not his spouse, against said person's will by means of force, violence, duress, menace, or fear of
27 immediate and unlawful bodily injury on said person or another.

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1 **COUNT THIRTY-FIVE**

2 In or about the period of October 1, 2017, to November 30, 2017, in the County of Los
3 Angeles, defendants NAASON JOAQUIN GARCIA and ALONDRA OCAMPO committed the
4 crime of FORCIBLE ORAL COPULATION, a violation of PENAL CODE SECTION
5 287(c)(2)(A), a Felony, in that they did unlawfully accomplish an act of oral copulation with a
6 person, to wit JANE DOE 5, against said person’s will by means of force, violence, duress,
7 menace, or fear of immediate and unlawful bodily injury on said person or another.

8 **COUNT THIRTY-SIX**

9 In or about the period of October 1, 2017, to November 30, 2017, in the County of Los
10 Angeles, defendant NAASON JOAQUIN GARCIA committed the crime of EXTORTION, a
11 violation of PENAL CODE SECTION 518, a Felony, in that he extorted property or other
12 consideration from JANE DOE 5, by means of force and threat such as is mentioned in Section
13 519.

14
15 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

16 It is further alleged that defendants NAASON JOAQUIN GARCIA, ALONDRA
17 OCAMPO, and SUSANA OAXACA MEDINA are ineligible for probation or suspension of
18 sentence pursuant to PENAL CODE SECTION 1203.065(a).

19
20 **NOTICE:** Convictions for the offenses alleged in counts 1-5, 7-15, 19-25, 27-29, 31, and 33-35
21 of this Information will require the defendants to register pursuant to Penal Code section 290 et
22 seq. Willful failure to register is a crime.

23
24 **NOTICE:** Conviction of these offenses will require the defendant to provide DNA samples and
25 print impressions pursuant to Penal Code section 296 and 296.1. Willful refusal to provide the
26 samples and impressions is a crime.

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NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270 [127 S.Ct. 856, 166 L.Ed.2d 856].

Respectfully Submitted,
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Attorney General of California
JAMES ROOT
Senior Assistant Attorney General
PATRICIA FUSCO
DIANA CALLAGHAN
Supervising Deputy Attorneys General



AMANDA G. PLISNER
Deputy Attorney General
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INFORMATION SUMMARY

Cnt. #	Charge	Range	Defendant	Allegation	Alleg. Effect
1.	PC 288(c)(1)	1/2/3	Garcia/Ocampo		
2.	PC 182(a)(1)/ 236.1(b)	8/14/20	Garcia/Ocampo		
3.	PC 236.1(b)	8/14/20	Ocampo		
4.	PC 266j	3/6/8	Ocampo		
5.	PC 261(a)(2)/ 264(c)(2)	7/9/11	Garcia/Ocampo		
6.	PC 261.5(c)	16 m/2/3	Garcia/Ocampo	12022.7	+5
7.	PC 287(c)(2)(C)	6/8/10	Garcia/Ocampo		
8.	PC 287(b)(1)	16m/2/3	Garcia/Ocampo		
9.	PC 287(c)(2)(C)	6/8/10	All		
10.	PC 287(b)(1)	16m/2/3	All		
11.	PC 182(a)(1)/ 236.1(b)	8/14/20	Garcia/Ocampo		
12.	PC 236.1(b)	8/14/20	Ocampo		
13.	PC 236.1(b)	8/14/20	Ocampo		
14.	PC 236.1(b)	8/14/20	Ocampo		
15.	PC 311.2(c)	16m/2/3	Ocampo		
16.	PC 518	2/3/4	Ocampo		
17.	PC 518	2/3/4	Ocampo		
18.	PC 518	2/3/4	Ocampo		
19.	PC 288.3	8m/1/18m	Ocampo		
20.	PC 288.3	8m/1/18m	Ocampo		
21.	PC 288.3	8m/1/18m	Ocampo		
22.	PC 261(a)(2)/ 264(a)	3/6/8	Garcia		
23.	PC 287(c)(2)(A)	3/6/8	Garcia		
24.	PC 261(a)(2)/ 264(a)	3/6/8	Garcia		
25.	PC 287(c)(2)(A)	3/6/8	Garcia		
26.	PC 518	2/3/4	Garcia		
27.	PC 311.11(a)	16/2/3	Garcia		
28.	PC 261(a)(2)/ 264(a)	3/6/8	Garcia/Ocampo		
29.	PC 287(c)(2)(A)	3/6/8	Garcia/Ocampo		
30.	PC 518	2/3/4	Garcia		
31.	PC 261(a)(2)/ 264(a)	3/6/8	Garcia/Ocampo		
32.	PC 518	2/3/4	Garcia		
33.	PC 289(a)(1)(A)	3/6/8	Ocampo		
34.	PC 261(a)(2)/ 264(a)	3/6/8	Garcia/Ocampo		
35.	PC 287(c)(2)(A)	3/6/8	Garcia/Ocampo		
36.	PC 518	2/3/4	Garcia		

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DECLARATION OF SERVICE BY E-MAIL

Case Name: **People v. Garcia, et al.**
No.: **BA484133**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On October 5, 2020, I served the attached

FIRST AMENDED INFORMATION

by transmitting a true copy via electronic mail. In addition, I placed a true copy thereof enclosed in a sealed envelope, in the internal mail system of the Office of the Attorney General, addressed as follows:

John Patrick Carey
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Kelly C. Quinn
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Attorneys for Naason Garcia

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on October 5, 2020, at Los Angeles, California.

Susan Figueroa
Declarant


Signature