

1 ROB BONTA
Attorney General of California

2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]

Attorneys for Plaintiff

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF EL DORADO

11 THE PEOPLE OF THE STATE OF
12 CALIFORNIA,

Plaintiff,

v.

15 MARC JAY BERMAN
16 [REDACTED]

17 Defendant.

Case No. 25CR0390

COMPLAINT (FELONY)

Arraignment

Date: March 10, 2025
Time: 8:30 a.m.
Dept.: 1 or 2 (TBD)

18 I, the undersigned, say on information and belief, that in the County of El Dorado, State of
19 California:

20 **COUNT ONE**

21 That on or about November 3, 2024, defendant MARC JAY BERMAN did commit a
22 FELONY, namely, a violation of Section 30600(a) of the Penal Code, **UNLAWFUL ASSAULT**
23 **WEAPON/.50 BMG RIFLE ACTIVITY**, in that defendant did unlawfully manufacture, caused
24 to be manufactured, distribute, transport, import into this State, keep for sale, offer and expose for
25 sale, give and lend an assault weapon and a .50 BMG rifle, to wit: Aero Precision, Model M4E1,
26 .5:56 NATO caliber, semi-automatic rifle, serial number M40576968.

27 **Penalty: 4, 6, 8 yrs. County Jail**

28 **Bail: \$50,000**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT TWO

For a further and separate cause of action, being a different offense from, but connected in its commission with the charge set forth in Count One hereof, complainant complains and says:

That on or about November 3, 2024, defendant MARC JAY BERMAN did commit a FELONY, namely, a violation of Section 30600(a) of the Penal Code, **UNLAWFUL ASSAULT WEAPON/.50 BMG RIFLE ACTIVITY**, in that defendant did unlawfully manufacture, caused to the manufactured, distribute, transport, import into this State, keep for sale, offer and expose for sale, give and lend an assault weapon and a .50 BMG rifle, to wit: Noreen Firearms, Model BN-308, 7.62 NATO caliber, semi-automatic rifle, serial number P5198.

Penalty: 4, 6, 8 yrs. County Jail

Bail: \$50,000

COUNT THREE

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One and Two hereof, complainant complains and says:

That on or about November 3, 2024, defendant MARC JAY BERMAN did commit a FELONY, namely, a violation of Section 30605(a) of the Penal Code, **POSSESSION OF AN ASSAULT WEAPON**, in that defendant did unlawfully possess an assault weapon, to wit: Aero Precision, Model M4E1, 5.56 NATO caliber, semi-automatic rifle, serial number M40576968.

Penalty: 16 mo., 2, 3 yrs. County Jail

Bail: \$50,000

COUNT FOUR

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Three hereof, complainant complains and says:

1 That on or about November 3, 2024, defendant MARC JAY BERMAN did commit a
2 FELONY, namely, a violation of Section 30605(a) of the Penal Code, **POSSESSION OF AN**
3 **ASSAULT WEAPON**, in that defendant did unlawfully possess an assault weapon, to wit:
4 Noreen Firearms, Model BN-308, 7.62 NATO caliber, semi-automatic rifle, serial number P5198.
5 **Penalty: 16 mo., 2, 3 yrs. County Jail**
6 **Bail: \$50,000**

7
8
9 I declare under penalty of perjury that the foregoing is true and correct.

10 Executed this 5 day of February 2025, at Sacramento, California.

11
12 
13 Deputy Attorney General
14
15
16
17
18
19
20
21

22 DISCOVERY REQUEST

23 Pursuant to the provisions of Penal Code sections 1054.5(b) and 1054.3, it is hereby
24 requested that all materials and information as set forth in Penal Code section 1054.3(a) and (b)
25 be provided to the People.

26
27 SA2024305157
38741652.docx
28