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ROB BONTA  
Attorney General of California

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*Attorneys for Plaintiff*

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF PLACER

**FEB 06 2025**

Jake Chatters  
Executive Officer & Clerk  
By: A. Zebrak, Deputy

*A. Zebrak*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF PLACER

**THE PEOPLE OF THE STATE OF CALIFORNIA,**

Plaintiff,

v.

**MARC JAY BERMAN**

[REDACTED]

Defendant.

Case No **62-203740**

**COMPLAINT (FELONY)**

**Arraignment**

Date: March 17, 2025  
Time: 8:30 a.m.  
Dept: 44

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

**COUNT ONE**

That on or about April 11, 2023, 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, cause to be 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: Unbranded AR LLC, Model UAR-F, multi-caliber, semi-automatic rifle, Serial Number UAM07022.

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

**Bail: \$50,000**

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**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 between January 11, 2023, and November 12, 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, cause to be 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: Aero Precision, Model M5, 308 Win, AR15 style semi-automatic rifle, serial number US280933.

**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 between February 11, 2023, and November 12, 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, cause to be 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: Aero Precision, Model M16A4, 5.56 NATO, AR 15 style semi-automatic rifle, serial number 00012905.

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

**Bail: \$50,000**

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**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:

That on or between April 18, 2023, and November 12, 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, cause to be 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: Joe Bob Outfitters, Model ML-15, 5.56 NATO, semi-automatic rifle, serial number KS09644.

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

**Bail: \$50,000**

**COUNT FIVE**

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 Four hereof, complainant complains and says:

That on or between May 3, 2023, and November 12, 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, cause to be 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: Radian, Model A-DAC, 5.56 NATO, AR 15 style semi-automatic rifle, serial number R1005265.

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

**Bail: \$50,000**

1 **COUNT SIX**

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

5 That on or between September 23, 2024, and November 12, 2024, defendant MARC JAY  
6 BERMAN did commit a FELONY, namely, a violation of Section 30600(a) of the Penal Code,  
7 **UNLAWFUL ASSAULT WEAPON/.50 BMG RIFLE ACTIVITY**, in that defendant did  
8 unlawfully manufacture, cause to be manufactured, distribute, transport, import into this State,  
9 keep for sale, offer and expose for sale, give and lend an assault weapon and a .50 BMG rifle, to  
10 wit: Aero Precision, Model M4E1, 5.56 NATO, AR15 style semi-automatic rifle, serial number  
11 M40625000.

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

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

14 **COUNT SEVEN**

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

18 That on or between October 5, 2024, and November 12, 2024, defendant MARC JAY  
19 BERMAN did commit a FELONY, namely, a violation of Section 30600(a) of the Penal Code,  
20 **UNLAWFUL ASSAULT WEAPON/.50 BMG RIFLE ACTIVITY**, in that defendant did  
21 unlawfully manufacture, cause to be manufactured, distribute, transport, import into this State,  
22 keep for sale, offer and expose for sale, give and lend an assault weapon and a .50 BMG rifle, to  
23 wit: Aero Precision, Model M4E1, 5.56 NATO, AR15 style semi-automatic rifle, serial number  
24 M40629948.

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

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

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**COUNT EIGHT**

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 Seven hereof, complainant complains and says:

That on or about November 12, 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 M16A4, 5.56 NATO, AR 15 style semi-automatic rifle, serial number 00012905.

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

**Bail: \$50,000**

**COUNT NINE**

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 Eight hereof, complainant complains and says:

That on or about November 12, 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: Radian, Model A-DAC, 5.56 NATO, AR 15 style semi-automatic rifle, serial number R1005265.

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

**Bail: \$50,000**

**COUNT TEN**

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 Nine hereof, complainant complains and says:

That on or about November 12, 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

1 Precision, Model M5, 6.5 Creedmoor, AR15 style semi-automatic rifle,  
2 serial number US232441.

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

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

5 **COUNT ELEVEN**

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

9 That on or about November 12, 2024, defendant MARC JAY BERMAN did commit a  
10 FELONY, namely, a violation of Section 30605(a) of the Penal Code, **POSSESSION OF AN**  
11 **ASSAULT WEAPON**, in that defendant did unlawfully possess an assault weapon, to wit: Aero  
12 Precision, Model M5, 308 Win, AR15 style semi-automatic rifle, serial number US280933.

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

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

15 **COUNT TWELVE**

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

19 That on or about November 12, 2024, defendant MARC JAY BERMAN did commit a  
20 FELONY, namely, a violation of Section 30605(a) of the Penal Code, **POSSESSION OF AN**  
21 **ASSAULT WEAPON**, in that defendant did unlawfully possess an assault weapon, to wit: Joe  
22 Bob Outfitters, Model ML-15, 5.56 NATO, semi-automatic rifle, serial number KS09644.

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

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

25 **COUNT THIRTEEN**

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

1 That on or about November 12, 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: KE  
4 Arms, Model KE-15, 300 Blackout, AR15 style semi-automatic rifle, serial number KF14355.

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

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

7 **COUNT FOURTEEN**

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

11 That on or about November 12, 2024, defendant MARC JAY BERMAN did commit a  
12 FELONY, namely, a violation of Section 30605(a) of the Penal Code, **POSSESSION OF AN**  
13 **ASSAULT WEAPON**, in that defendant did unlawfully possess an assault weapon, to wit: Aero  
14 Precision, Model M4E1, 5.56 NATO, AR15 style semi-automatic rifle, serial number  
15 M40629948.

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

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

18 **COUNT FIFTEEN**

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

22 That on or about November 12, 2024, defendant MARC JAY BERMAN did commit a  
23 FELONY, namely, a violation of Section 30605(a) of the Penal Code, **POSSESSION OF AN**  
24 **ASSAULT WEAPON**, in that defendant did unlawfully possess an assault weapon, to wit: Aero  
25 Precision, Model M4E1, 5.56 NATO, AR15 style semi-automatic rifle, serial number  
26 M40625000.

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

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

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**COUNT SIXTEEN**

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 Fifteen hereof, complainant complains and says:

That on or about November 12, 2024, defendant MARC JAY BERMAN did commit a FELONY, namely, a violation of Section 33410 of the Penal Code, **POSSESSION OF A SILENCER**, in that defendant did unlawfully possess a silencer for firearms.

It is further alleged that probation shall not be granted except in an unusual case where the interest of justice would best be served within the meaning of Penal Code section 1203(e)(11).

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

**Bail: \$25,000**

**COUNT SEVENTEEN**

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 Sixteen hereof, complainant complains and says:

That on or about May 2, 2024, defendant MARC JAY BERMAN did commit a MISDEMEANOR, namely, a violation of Section 29180(d)(1)(A) of the Penal Code, **UNLAWFUL SALE OR TRANSFER OF A PERSONALLY MANUFACTURED OR ASSEMBLED FIREARM**, in that defendant did unlawfully sell or transfer ownership of a firearm that he personally manufactured or assembled, to wit, Juggernaut Tactical Inc., Model JTE15, .223 semi-automatic rifle, serial number 19566, without being a federally licensed firearms manufacturer.

**Penalty: 6 mo.**

**Bail: \$1,000**

**COUNT EIGHTEEN**

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 Seventeen hereof, complainant complains and says:




1 That on or about October 16, 2024, defendant MARC JAY BERMAN did commit a  
2 MISDEMEANOR, namely, a violation of Section 29180(d)(1)(A) of the Penal Code,  
3 **UNLAWFUL SALE OR TRANSFER OF A PERSONALLY MANUFACTURED OR**  
4 **ASSEMBLED FIREARM**, in that defendant did unlawfully sell or transfer ownership of a  
5 firearm that he personally manufactured or assembled, to wit, Aero Precision, Model M4E1,  
6 multi-caliber semi-automatic rifle, serial number M40619828, without being a federally licensed  
7 firearms manufacturer.

8 **Penalty: 6 mo.**

9 **Bail: \$1,000**

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12 I declare under penalty of perjury that the foregoing is true and correct.

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

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16 / Deputy Attorney General  
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21 **DISCOVERY REQUEST**

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

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