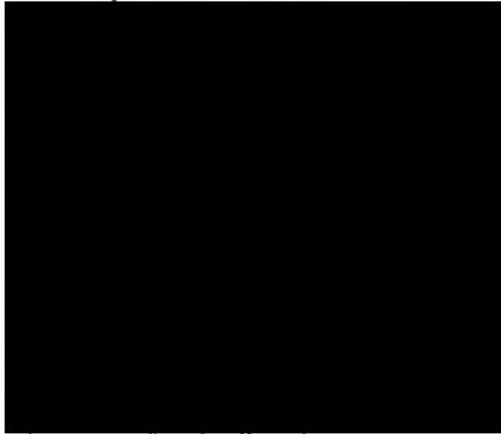


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ROB BONTA
Attorney General of California



Attorneys for the People

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

JOSE HECTOR RUIZ,
aka Jose Hector Aguilar Ruiz



Defendant.

Case No.: CS234395
FELONY COMPLAINT

The undersigned is informed and believes that:

COUNT 1

TRANSPORTATION FOR SALE OF A CONTROLLED SUBSTANCE – 3-4-5 YEARS

On or about February 9, 2024, in the County of San Diego, the crime of
TRANSPORTATION FOR SALE OF A CONTROLLED SUBSTANCE in violation of Health &
Safety Code section 11352, subdivision (a), a felony, was committed by JOSE HECTOR RUIZ,

1 who did unlawfully transport, import into the State of California, sell, furnish, administer, and give
2 away, a controlled substance, to wit: FENTANYL.

3
4 **FIRST SPECIAL ALLEGATION**

5 **PUNISHMENT BY QUANTITY – 20 YEARS**

6 It is further alleged as to defendant JOSE HECTOR RUIZ as to Count 1, that the substance
7 in the above charged offense exceeds 40 kilograms by weight within the meaning of Health and
8 Safety code section 11370.4(a)(1)(e).

9
10 **SECOND SPECIAL ALLEGATION**

11 **CIRCUMSTANCES IN AGGRAVATION**

12 **CALIFORNIA RULE OF COURT 4.421 (PENAL CODE SECTION 1170(b)(2))**

13 It is further alleged as to defendant JOSE HECTOR RUIZ as to Count 1, pursuant to Penal
14 Code Section 1170(b)(2) and within the meaning of California Rules of Court Rule 4.421, that there
15 exist circumstances in aggravation, including the following factors:

- 16 1. The manner in which the crime was carried out indicates planning, sophistication, or
17 professionalism (Rule 4.421(a)(8)); and,
18 2. The crime involved a large quantity of contraband (Rule 4.421(a)(10)).
19

20 **REQUEST FOR DISCOVERY**

21 Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request that
22 defense counsel provide discovery to the People as required by Penal Code section 1054.3.
23

24 **NOTICE TO ATTORNEY**

25 Any materials accompanying this complaint or provided by the People in this case may
26 contain information about witnesses. Such information is subject to Penal Code section 1054.2,
27 which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or
28 telephone number of a victim or witness whose name is disclosed to the attorney pursuant to

1 subdivision (a) of section 1054.1 unless specifically permitted to do so by the court after a hearing
2 and a showing of good cause.

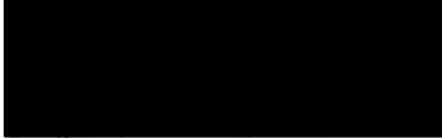
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4 **NOTICE OF DNA COLLECTION**

5 Sheriff's records indicate that as of the booking date one or more defendants have not yet
6 provided a DNA sample to the DOJ database. Pursuant to Penal Code section 296(e), the court
7 shall order collection of DNA from the defendant(s) if advised by the prosecuting attorney that a
8 sample is required but has not been provided by the defendant. Pursuant to Penal Code sections
9 296/296.1, if not already required from a past conviction, any defendants who have not done so
10 will be required to provide a sample upon conviction of this felony offense.

11
12 Dated: February 13, 2024

Respectfully submitted,

13 ROB BONTA
14 *Attorney General of California*

15 
16 Deputy Attorney General
17 *Attorneys for the People of the State of*
18 *California*