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FILED
Superior Court of California
County of Placer

MAY 02 2024

JAKE CHATTERS
EXECUTIVE OFFICER & CLERK
By: S. Ziegelmann, Deputy

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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF PLACER

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

Plaintiff,

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15 v.

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17 **SHEKIRA BRANCHE THOMPSON,**

Defendant.
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Case No. 62-194358

FIRST AMENDED COMPLAINT

[DOCKET No: SA2023301420]

20 The People of the State of California hereby allege that in the County of Placer, State of
21 California, and elsewhere, within the State of California, before the making of this criminal
22 complaint, the above-named defendant, SHEKIRA BRANCHE THOMPSON ([REDACTED]),
23 committed the following different criminal offenses all connected together in their commission,
24 and being two or more different offenses of the same class of crimes or offenses, under separate
25 counts:

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COUNT 1

**Penal Code section 368, subdivision (e) - a Felony
Theft from Elder or Dependent Adult - 2, 3, or 4 years**

On or about and between November 12, 2022, and November 27, 2022, the defendant, SHEKIRA BRANCHE THOMPSON, being a caretaker, did willfully, unlawfully, and feloniously, commit theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, goods, and services taken and having a value exceeding \$950, and knew and reasonably known that said person, **Keith M.**, 76 years old, was an elder and dependent adult, in violation of Penal Code Section 368, subdivision (e), a felony.

COUNT 2

**Penal Code section 368, subdivision (e) - a Felony
Theft from Elder or Dependent Adult - 2, 3, or 4 years**

On or about and between December 2, 2022, and December 10, 2022, the defendant, SHEKIRA BRANCHE THOMPSON, being a caretaker, did willfully, unlawfully, and feloniously, commit theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, goods, and services taken and having a value exceeding \$950, and knew and reasonably known that said person, **Antonio M.**, 83 years old, was an elder and dependent adult, in violation of Penal Code Section 368, subdivision (e), a felony.

COUNT 3

Penal Code section 368, subdivision (e) - a Misdemeanor

On or about and between December 17, 2022, and December 21, 2022, the defendant, SHEKIRA BRANCHE THOMPSON, being a caretaker, did willfully, unlawfully, and feloniously, commit theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, goods, and services taken and having a value not exceeding \$950, and knew and reasonably known that said person, **Harold G.**, 96 years old, was an elder and dependent adult, in violation of Penal Code Section 368, subdivision (e), a misdemeanor.

1 **SPECIAL ALLEGATIONS**

2 **Circumstance in Aggravation – California Rule of Court § 4.421(a)(1)**

3 It is further alleged, pursuant to California Rules of Court, Rule 4.421(a)(1), that the
4 offenses set forth in Counts 1, 2, and 3, that crime involved acts disclosing a high degree of
5 callousness, within the meaning of California Rules of Court, rule 4.421(a)(1).

6 **Circumstance in Aggravation – California Rule of Court § 4.421(a)(3)**

7 It is further alleged, pursuant to California Rules of Court, Rule 4.421(a)(3), that the
8 offenses set forth in Counts 1, 2, and 3, that the victims were particularly vulnerable, within the
9 meaning of California Rules of Court, rule 4.421(a)(3).

10 **Circumstance in Aggravation – California Rule of Court § 4.421(a)(8)**

11 It is further alleged, pursuant to California Rules of Court, Rule 4.421(a)(8), that the
12 offenses set forth in Counts 1, 2, and 3, that the manner in which the crime was carried out indicates
13 planning, sophistication, or professionalism, within the meaning of California Rules of Court, rule
14 4.421(a)(8).

15 **Circumstance in Aggravation – California Rule of Court § 4.421(a)(11)**

16 It is further alleged, pursuant to California Rules of Court, Rule 4.421(a)(11), that the
17 offenses set forth in Counts 1, 2, and 3, that the defendant took advantage of a position of trust or
18 confidence to commit the offense, within the meaning of California Rules of Court, rule
19 4.421(a)(11).

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I declare under penalty of perjury, on information and belief, pursuant to the laws of the State of California, that the foregoing is true and correct.

Dated: April 18, 2024

Respectfully Submitted,
ROB BONTA
Attorney General of California



BIANCA YIP
Deputy Attorney General
Attorneys for the People of the State of California

REQUEST FOR DISCOVERY

Pursuant to Penal Code section 1054.5, subdivision (b), the People request from defendant and defense counsel all materials and information required to be disclosed to the prosecution by the defense under the authority of Penal Code section 1054.3, including the following:

1. The names and addresses of persons, other than the defendants, whom the defendants intend to call as witnesses at trial. [Pen. Code § 1054.3, subd. (a)].
2. Any relevant written or recorded statements of persons whom the defendants intend to call as witnesses at trial. [Pen. Code § 1054.3, subd. (a)].
3. Any reports of the statements of persons whom the defendants intend to call as witnesses at trial. [Pen. Code § 1054.3, subd. (a)].
4. Any reports or statements of experts made in connection with the case. [Pen. Code § 1054.3, subd. (a)].
5. Any results of physical or mental examinations, scientific tests, experiments or comparisons which the defendants intend to offer in evidence at the trial. [Pen. Code § 1054.3, subd. (a)].
6. Any real evidence which the defendant intends to offer in evidence at the trial. [Pen. Code § 1054.3, subd. (a)].

This is a continuing request for the above information. If the information becomes available at a future time, the prosecution, by this request, asks that it be immediately disclosed to the prosecution.