

1 ROB BONTA
Attorney General of California
2 ROBIN URBANSKI
Supervising Deputy Attorney General
3 BRENDON W. MARSHALL
Deputy Attorney General
4 State Bar No. 292550
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9123
7 Fax: (619) 645-2191
E-mail: Brendon.Marshall@doj.ca.gov
8 *Attorneys for Plaintiff*

9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN BERNARDINO
12

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

Plaintiff,

Case No.

FELONY COMPLAINT

15 v.

16 **DAVID REDMOND**

17 (DOB [REDACTED])

18 and

19 **BRIAN SEMINAR**

20 (DOB [REDACTED])

21 Defendants.
22

23 The undersigned, certifying upon information and belief, complains that in the County of
24 San Bernardino, State of California, defendant did commit the following crimes:

25 **COUNT 1**

26 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
27 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
28

1 was committed by David Redmond, who did own or possess a firearm, knowing that he was
2 prohibited from doing so by a prior felony conviction, to wit: Ruger 10-22 SN # [REDACTED]

3 **COUNT 2**

4 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
5 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
6 was committed by David Redmond, who did own or possess a firearm, knowing that he was
7 prohibited from doing so by a prior felony conviction, to wit: Remington 700 SN # [REDACTED]

8 **COUNT 3**

9 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
10 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
11 was committed by David Redmond, who did own or possess a firearm, knowing that he was
12 prohibited from doing so by a prior felony conviction, to wit: Arsenal SLR1015 SN #
13 [REDACTED]

14 **COUNT 4**

15 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
16 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
17 was committed by David Redmond, who did own or possess a firearm, knowing that he was
18 prohibited from doing so by a prior felony conviction, to wit: Ruler 10-22 SN # [REDACTED]

19 **COUNT 5**

20 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
21 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
22 was committed by David Redmond, who did own or possess a firearm, knowing that he was
23 prohibited from doing so by a prior felony conviction, to wit: Springfield Socom 16 SN # [REDACTED]

24 **COUNT 6**

25 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
26 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
27 was committed by David Redmond, who did own or possess a firearm, knowing that he was
28

1 prohibited from doing so by a prior felony conviction, to wit: Benelli M1 Super 90 SN #
2 [REDACTED]

3 **COUNT 7**

4 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
5 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
6 was committed by David Redmond, who did own or possess a firearm, knowing that he was
7 prohibited from doing so by a prior felony conviction, to wit: Remington Sportsman 58 SN #
8 [REDACTED]

9 **COUNT 8**

10 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
11 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
12 was committed by David Redmond, who did own or possess a firearm, knowing that he was
13 prohibited from doing so by a prior felony conviction, to wit: Ruger Mark II SN # [REDACTED]

14 **COUNT 9**

15 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
16 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
17 was committed by David Redmond, who did own or possess a firearm, knowing that he was
18 prohibited from doing so by a prior felony conviction, to wit: P80, unserialized, evidence # 004-
19 014.

20 **COUNT 10**

21 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
22 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
23 was committed by David Redmond, who did own or possess a firearm, knowing that he was
24 prohibited from doing so by a prior felony conviction, to wit: Glock 23 SN # [REDACTED]

25 **COUNT 11**

26 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
27 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
28

1 was committed by David Redmond, who did own or possess a firearm, knowing that he was
2 prohibited from doing so by a prior felony conviction, to wit: Sig Sauer P226 SN # [REDACTED]

3 **COUNT 12**

4 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
5 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
6 was committed by David Redmond, who did own or possess a firearm, knowing that he was
7 prohibited from doing so by a prior felony conviction, to wit: Wilkinson Arms Parma ID SN #
8 [REDACTED]

9 **COUNT 13**

10 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
11 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
12 was committed by David Redmond, who did own or possess a firearm, knowing that he was
13 prohibited from doing so by a prior felony conviction, to wit: Ruger Single Six SN # [REDACTED]

14 **COUNT 14**

15 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
16 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
17 was committed by David Redmond, who did own or possess a firearm, knowing that he was
18 prohibited from doing so by a prior felony conviction, to wit: Ruger 10-22 SN # [REDACTED]

19 **COUNT 15**

20 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
21 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
22 was committed by David Redmond, who did own or possess a firearm, knowing that he was
23 prohibited from doing so by a prior felony conviction, to wit: Sig Sauer P228 SN # [REDACTED]

24 **COUNT 16**

25 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
26 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
27 was committed by David Redmond, who did own or possess a firearm, knowing that he was
28 prohibited from doing so by a prior felony conviction, to wit: Inter Arms 62 SA SN # [REDACTED]

1 **COUNT 17**

2 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
3 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
4 was committed by David Redmond, who did own or possess a firearm, knowing that he was
5 prohibited from doing so by a prior felony conviction, to wit: Ruger Mark II SN # [REDACTED]
6

7 **COUNT 18**

8 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
9 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
10 was committed by David Redmond, who did own or possess a firearm, knowing that he was
11 prohibited from doing so by a prior felony conviction, to wit: Browning Buckmark SN #
12 [REDACTED]
13

14 **COUNT 19**

15 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
16 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
17 was committed by David Redmond, who did own or possess a firearm, knowing that he was
18 prohibited from doing so by a prior felony conviction, to wit: Glock 19 SN # [REDACTED]
19

20 **COUNT 20**

21 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
22 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
23 was committed by David Redmond, who did own or possess a firearm, knowing that he was
24 prohibited from doing so by a prior felony conviction, to wit: Aero Precision X15 SN # [REDACTED]
25

26 **COUNT 21**

27 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
28 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
was committed by David Redmond, who did own or possess a firearm, knowing that he was
prohibited from doing so by a prior felony conviction, to wit: Aero Precision M4E1 SN #
[REDACTED]

1 **COUNT 22**

2 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
3 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
4 was committed by David Redmond, who did own or possess a firearm, knowing that he was
5 prohibited from doing so by a prior felony conviction, to wit: Remington 870 Express SN #
6 [REDACTED]

7 **COUNT 23**

8 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
9 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
10 was committed by David Redmond, who did own or possess a firearm, knowing that he was
11 prohibited from doing so by a prior felony conviction, to wit: P80, unserialized, evidence # 006-
12 002.

13 **COUNT 24**

14 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
15 POSSESSION OF AMMUNITION, in violation of PENAL CODE SECTION 30305(a)(1), a
16 felony, was committed by David Redmond, who did own or possess ammunition, knowing that
17 he was prohibited from doing so by a prior felony conviction.

18 **COUNT 25**

19 On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL
20 MANUFACTURING OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION
21 30600(a), a felony, was committed by David Redmond, did unlawfully manufacture, caused to
22 the manufactured, an assault weapon, to wit: Aero Precision STS15 SN # [REDACTED]

23 **COUNT 26**

24 On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL
25 MANUFACTURING OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION
26 30600(a), a felony, was committed by David Redmond, did unlawfully manufacture, caused to
27 the manufactured, an assault weapon, to wit: Aero Precision X15 SN # [REDACTED]

28 ///

1 **COUNT 27**

2 On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL
3 MANUFACTURING OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION
4 30600(a), a felony, was committed by David Redmond, did unlawfully manufacture, caused to
5 the manufactured, an assault weapon, to wit: LMT Defense Defender 2000 SN # [REDACTED]

6 **COUNT 28**

7 On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL
8 MANUFACTURING OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION
9 30600(a), a felony, was committed by David Redmond, did unlawfully manufacture, caused to
10 the manufactured, an assault weapon, to wit: Aero Precision STS15 SN # [REDACTED]

11 **COUNT 29**

12 On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL
13 MANUFACTURING OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION
14 30600(a), a felony, was committed by David Redmond, did unlawfully manufacture, caused to
15 the manufactured, an assault weapon, to wit: Aero Precision M4E1 SN # [REDACTED]

16 **COUNT 30**

17 On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL
18 MACHINE GUN ACTIVITY, in violation of PENAL CODE SECTION 32625(b), a felony, was
19 committed by David Redmond, who did intentionally and unlawfully convert a firearm into a
20 machinegun, sell, offer for sale, or knowingly manufactured a machinegun, to wit: Aero Precision
21 X15 SN # [REDACTED]

22 **COUNT 31**

23 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
24 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
25 was committed by Brian Seminar, who did own or possess a firearm, knowing that he was
26 prohibited from doing so by a prior felony conviction, to wit: Glock 22 SN # [REDACTED]

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1 **COUNT 32**

2 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
3 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
4 was committed by Brian Seminar, who did own or possess a firearm, knowing that he was
5 prohibited from doing so by a prior felony conviction, to wit: Polymer 80 19, unserialized,
6 evidence # 001-004.

7 **COUNT 33**

8 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
9 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
10 was committed by Brian Seminar, who did own or possess a firearm, knowing that he was
11 prohibited from doing so by a prior felony conviction, to wit: Glock 26 SN # [REDACTED]

12 **COUNT 34**

13 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
14 POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony,
15 was committed by Brian Seminar, who did own or possess a firearm, knowing that he was
16 prohibited from doing so by a prior felony conviction, to wit: AR-15 style rifle, unserialized,
17 evidence # 002-001.

18 **COUNT 35**

19 On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN
20 POSSESSION OF AMMUNITION, in violation of PENAL CODE SECTION 30305(a)(1), a
21 felony, was committed by Brian Seminar, who did own or possess ammunition, knowing that he
22 was prohibited from doing so by a prior felony conviction.

23 **NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY**

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

26 **NOTICE TO ATTORNEY**

27 The materials accompanying this notice may include information about witnesses. If so,
28 these materials are disclosed to you pursuant to Penal Code section 1054.2(a)(1), which provides:

“[N]o attorney may disclose or permit to be disclosed to a defendant, members of the defendant’s family, or anyone else, the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1, unless specifically permitted to do so by the court after a hearing and a showing of good cause.”

I declare under penalty of perjury that the foregoing is true and correct and that this Felony Complaint consists of 35 Counts.

Executed April 3, 2025, in San Diego, California.

Respectfully Submitted,

ROB BONTA
Attorney General of California
ROBIN URBANSKI
Supervising Deputy Attorney General

/s/Brendon W. Marshall
BRENDON W. MARSHALL
Deputy Attorney General
Attorneys for Plaintiff

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