

ORIGINAL

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*Attorneys for Plaintiff*

FILED

JUN 14 2019

SUPERIOR COURT  
COUNTY OF IMPERIAL  
CLERK OF THE COURT  
BY *[Signature]* DEPUTY  
L. JAUREGUI

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF IMPERIAL

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

EDGARD GARCIA  
(DOB: 9/11/1982),

Defendant.

Case No. *ECM005230*

MISDEMEANOR COMPLAINT

Based on information and belief, the undersigned complains that in the County of Imperial,  
State of California, defendant committed the following crimes:

COUNT 1 (Veh. Code, § 23152(a))

**Driving Under the Influence of an Alcoholic Beverage**

On or about May 7, 2019, Edgard Garcia did drive a vehicle while under the influence of an  
alcoholic beverage in violation of Vehicle Code section 23152, subdivision (a), a misdemeanor.

1 It is further alleged pursuant to Vehicle Code section 23578 that in the commission of a  
2 violation of Vehicle Code section 23152, the concentration of alcohol in defendant's blood was  
3 0.15 percent and more, by weight.

4 **COUNT 2 (Veh. Code, § 23152(b))**

5 **Driving with a .08% Blood Alcohol Content**

6 On or about May 7, 2019, Edgard Garcia did unlawfully, while having 0.08 percent or more,  
7 by weight, of alcohol in the blood drive a vehicle in violation of Vehicle Code section 23152,  
8 subdivision (b), a misdemeanor.

9 It is further alleged pursuant to Vehicle Code section 23578 that in the commission of a  
10 violation of Vehicle Code section 23152, the concentration of alcohol in defendant's blood was  
11 0.15 percent and more, by weight.

12 **REQUEST FOR DISCOVERY**

13 Pursuant to Penal Code section 1054.5, subdivision (b), the People are hereby informally  
14 requesting that defendant's counsel provide discovery to the People as required by Penal Code  
15 section 1054.3.

16 I declare under penalty of perjury that the forgoing is true and correct and that this Complaint  
17 consists of Two counts. Executed this 12th day of June, 2019, at San Diego, California.

18 Respectfully Submitted,

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22 ADRIAN R. CONTRERAS  
23 Deputy Attorney General  
Attorneys for Plaintiff

24 SD2019800555  
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**DECLARATION OF SERVICE BY U.S. MAIL AND OVERNIGHT COURIER**

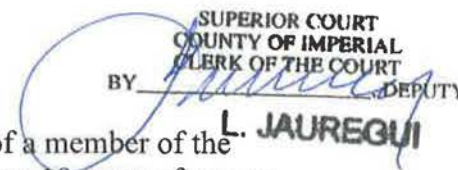
**FILED**

**JUN 14 2019**

Case Name: ***People v. Edgard Garcia***

Case No.:

I declare:

SUPERIOR COURT  
COUNTY OF IMPERIAL  
CLERK OF THE COURT  
BY  DEPUTY  
**L. JAUREGUI**

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter; my business address is: 600 West Broadway, Suite 1800, P.O. Box 85266, San Diego, CA 92186-5266.

On June 13, 2019, I served the attached **Misdemeanor Complaint and Notify Letter** by placing a true copy thereof enclosed in a sealed envelope with **FedEx**, and by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Mail at San Diego, California, addressed as follows:

Edgard Garcia  
1216 W. Aurora Drive  
El Centro, CA 92243

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on June 13, 2019, at San Diego, California.

Konstance Armstrong  
Declarant

  
Signature