

ORIGINAL

NO FEE PURSUANT TO GOVERNMENT
CODE SECTION 6103

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

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

13 **PEOPLE OF THE STATE OF CALIFORNIA,**
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15 Plaintiff,
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17 **EDGARD GARCIA**
(DOB: 9/11/1982),
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19 Defendant.

Case No. *ECM005230*
MISDEMEANOR COMPLAINT

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

22 **COUNT 1 (Veh. Code, § 23152(a))**

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

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

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