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6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF LOS ANGELES  
11

12  
13 THE PEOPLE OF THE STATE OF  
CALIFORNIA,

14 Plaintiff,

15 v.

- 16 1) LAWRENCE FOUNTAIN [REDACTED]  
17 (Bk#6660846)  
18 2) KEVIN HAWKINS [REDACTED]  
19 3) ZANIYAH HOILFIELD [REDACTED]  
20 4) KEJUAN MORGAN [REDACTED]  
21 5) ISAIAH THOMAS [REDACTED]

22 Defendants.

Case No. LA100081

FIRST AMENDED FELONY COMPLAINT

CONFORMED COPY  
ORIGINAL FILED  
Superior Court of California  
County of Los Angeles

NOV 09 2023

David W. Slayton, Executive Officer/Clerk of Court

23  
24 The Attorney General of the State of California, based on information and belief, accuses the above-  
25 named Defendants of the following offenses, which are connected to each other in their commission:  
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27  
28

1 COUNT 1

2 On or between February 23, 2022 and August 26, 2023, in the counties of Los Angeles, Orange,  
3 Riverside, San Bernardino, San Diego, and Ventura, the crime of ORGANIZED RETAIL THEFT, a  
4 violation of PENAL CODE SECTION 490.4(a), a Felony, was committed by defendants LAWRENCE  
5 FOUNTAIN, KEVIN HAWKINS, ZANIYAH HOILFIELD, KEJUAN MORGAN, and ISIAIAH  
6 THOMAS, who did unlawfully act in concert with one or more persons to steal merchandise from one or  
7 more merchant's premises with the intent to sell, exchange, or return the merchandise for value, in which  
8 the violations are committed on two or more separate occasions within a twelve month period, in which  
9 the aggregate value of the merchandise stolen, received, purchased or possessed, is in excess of Nine  
10 Hundred and Fifty Dollars (\$950), to wit: Target and Walmart worth approximately \$133,002.28.

11 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General  
12 pursuant to Penal Code section 786.5.

13 COUNT 2

14 On or about May 13, 2023, in the County of Los Angeles, the crime of SECOND DEGREE  
15 ROBBERY, a violation of PENAL CODE SECTION 211, a Felony, was committed by defendant  
16 LAWRENCE FOUNTAIN, who did unlawfully, and by means of force or fear take personal property  
17 from the person, possession, and immediate presence of [REDACTED]

18  
19 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a  
20 violent felony within the meaning of Penal Code Section 667.5(c).

21  
22 NOTICE: Upon a felony conviction, prison custody time is to be served in state prison based upon the  
23 above felony offense being a serious felony as defined in Penal Code section 1192.7(c) and/or a violent  
24 felony as defined in Penal Code section 667.5(c), or a felony offense requiring registration as a sex  
25 offender pursuant to Penal Code section 290(c), within the meaning of Penal Code section 1170(h)(3).

26 COUNT 3

27 On or about May 15, 2023, in the County of Los Angeles, the crime of SECOND DEGREE  
28 ROBBERY, a violation of PENAL CODE SECTION 211, a Felony, was committed by defendant

1 LAWRENCE FOUNTAIN, who did unlawfully, and by means of force or fear take personal property  
2 from the person, possession, and immediate presence of [REDACTED]

3  
4 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a  
5 violent felony within the meaning of Penal Code Section 667.5(c).

6  
7 NOTICE: Upon a felony conviction, prison custody time is to be served in state prison based upon the  
8 above felony offense being a serious felony as defined in Penal Code section 1192.7(c) and/or a violent  
9 felony as defined in Penal Code section 667.5(c), or a felony offense requiring registration as a sex  
10 offender pursuant to Penal Code section 290(c), within the meaning of Penal Code section 1170(h)(3).

11 COUNT 4

12 On or about June 6, 2023, in the County of Riverside, the crime of SECOND DEGREE ROBBERY,  
13 a violation of PENAL CODE SECTION 211, a Felony, was committed by defendant LAWRENCE  
14 FOUNTAIN, who did unlawfully, and by means of force or fear take personal property from the person,  
15 possession, and immediate presence of [REDACTED]

16  
17 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a  
18 violent felony within the meaning of Penal Code Section 667.5(c).

19  
20 NOTICE: Upon a felony conviction, prison custody time is to be served in state prison based upon the  
21 above felony offense being a serious felony as defined in Penal Code section 1192.7(c) and/or a violent  
22 felony as defined in Penal Code section 667.5(c), or a felony offense requiring registration as a sex  
23 offender pursuant to Penal Code section 290(c), within the meaning of Penal Code section 1170(h)(3).

24  
25 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General pursuant to  
26 Penal Code section 786.5.

1 COUNT 5

2 On or about March 4, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a  
3 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE  
4 FOUNTAIN and ZANIYAH HOILFIELD, who did willfully and unlawfully take personal property of  
5 another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Target worth  
6 approximately \$999.98.

7 COUNT 6

8 On or about March 24, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a  
9 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant LAWRENCE  
10 FOUNTAIN, who did willfully and unlawfully take personal property of another of a value exceeding nine  
11 hundred fifty dollars (\$950), to wit: Merchandise from Target worth approximately \$1,659.96.

12 COUNT 7

13 On or about April 7, 2023, in the County of Riverside, the crime of GRAND THEFT, a violation of  
14 PENAL CODE SECTION 487(a), a Felony, was committed by defendant LAWRENCE FOUNTAIN,  
15 who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty  
16 dollars (\$950), to wit: Merchandise from Target worth approximately \$1,399.96.

17 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General  
18 pursuant to Penal Code section 786.5.

19 COUNT 8

20 On or about April 19, 2023, in the County of Orange, the crime of GRAND THEFT, a violation of  
21 PENAL CODE SECTION 487(a), a Felony, was committed by defendant LAWRENCE FOUNTAIN,  
22 who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty  
23 dollars (\$950), to wit: Merchandise from Target worth approximately \$1,289.97.

24 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General  
25 pursuant to Penal Code section 786.5.  
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1 COUNT 9

2 On or about April 25, 2023, in the County of Orange, the crime of GRAND THEFT, a violation of  
3 PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE FOUNTAIN and  
4 ZANIYAH HOILFIELD, who did willfully and unlawfully take personal property of another of a value  
5 exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Target worth approximately  
6 \$1,499.97.

7 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General  
8 pursuant to Penal Code section 786.5.

9 COUNT 10

10 On or about April 30, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a  
11 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE  
12 FOUNTAIN and ZANIYAH HOILFIELD, who did willfully and unlawfully take personal property of  
13 another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Target worth  
14 approximately \$3,399.91.

15 COUNT 11

16 On or about May 10, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation  
17 of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE FOUNTAIN  
18 and ISAIAH THOMAS, who did willfully and unlawfully take personal property of another of a value  
19 exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Target worth approximately  
20 \$1,429.96.

21 COUNT 12

22 On or about May 17, 2023, in the County of San Bernardino, the crime of GRAND THEFT, a  
23 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant LAWRENCE  
24 FOUNTAIN, who did willfully and unlawfully take personal property of another of a value exceeding nine  
25 hundred fifty dollars (\$950), to wit: Merchandise from Target worth approximately \$4,689.81.  
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1 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General  
2 pursuant to Penal Code section 786.5.

3 **COUNT 13**

4 On or about May 18, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation  
5 of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE FOUNTAIN,  
6 ZANIYAH HOILFIELD, and ISAAH THOMAS, who did willfully and unlawfully take personal property  
7 of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Target worth  
8 approximately \$3,439.92.

9 **COUNT 14**

10 On or about June 18, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation  
11 of PENAL CODE SECTION 487(a), a Felony, was committed by defendant LAWRENCE FOUNTAIN,  
12 who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty  
13 dollars (\$950), to wit: Merchandise from Target worth approximately \$1,739.97.

14 **COUNT 15**

15 On or about July 1, 2023, in the County of Orange, the crime of GRAND THEFT, a violation of  
16 PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE FOUNTAIN and  
17 ZANIYAH HOILFIELD, who did willfully and unlawfully take personal property of another of a value  
18 exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Walmart worth approximately  
19 \$1,756.00.

20 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General  
21 pursuant to Penal Code section 786.5.

22 **COUNT 16**

23 On or about July 5, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation  
24 of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE FOUNTAIN  
25 and KEVIN HAWKINS, who did willfully and unlawfully take personal property of another of a value  
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1 exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Walmart worth approximately  
2 \$2,324.00.

3 **COUNT 17**

4 On or about July 19, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation  
5 of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE FOUNTAIN  
6 and ZANIYAH HOILFIELD, who did willfully and unlawfully take personal property of another of a  
7 value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Target worth approximately  
8 \$1,199.98.

9 **COUNT 18**

10 On or about August 2, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a  
11 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE  
12 FOUNTAIN and KEVIN HAWKINS, who did willfully and unlawfully take personal property of another  
13 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Walmart worth  
14 approximately \$1,701.00.

15 **COUNT 19**

16 On or about August 10, 2023, in the County of San Diego, the crime of GRAND THEFT, a  
17 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE  
18 FOUNTAIN and ZANIYAH HOILFIELD, who did willfully and unlawfully take personal property of  
19 another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Target worth  
20 approximately \$1,909.93.

21 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General  
22 pursuant to Penal Code section 786.5.

23 **COUNT 20**

24 On or about August 15, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a  
25 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE  
26 FOUNTAIN and ZANIYAH HOILFIELD, who did willfully and unlawfully take personal property of  
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1 another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Target worth  
2 approximately \$1,949.97.


3 **COUNT 21**

4 On or about August 22, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a  
5 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE  
6 FOUNTAIN and ZANIYAH HOILFIELD, who did willfully and unlawfully take personal property of  
7 another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Walmart worth  
8 approximately \$2,016.00.

9 **COUNT 22**

10 On or about May 13, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation  
11 of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE FOUNTAIN  
12 and ZANIYAH HOILFIELD, who did willfully and unlawfully take personal property of another of a  
13 value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Target worth approximately  
14 \$3,039.89.

15 **COUNT 23**

16 On or about May 15, 2023, in the County of Los Angeles, the crime of SECOND DEGREE  
17 ROBBERY, a violation of PENAL CODE SECTION 211, a Felony, was committed by defendant ISAIAH  
18 THOMAS, who did unlawfully, and by means of force or fear take personal property from the person,  
19 possession, and immediate presence of 

20 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a  
21 violent felony within the meaning of Penal Code Section 667.5(c).

22 NOTICE: Upon a felony conviction, prison custody time is to be served in state prison based upon the  
23 above felony offense being a serious felony as defined in Penal Code section 1192.7(c) and/or a violent  
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1 felony as defined in Penal Code section 667.5(c), or a felony offense requiring registration as a sex  
2 offender pursuant to Penal Code section 290(c), within the meaning of Penal Code section 1170(h)(3).

3  
4 **COUNT 24**

5 On or about May 15, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation  
6 of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE FOUNTAIN  
7 and ZANIYAH HOILFIELD, who did willfully and unlawfully take personal property of another of a  
8 value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Target worth approximately  
9 \$2,089.95.

10 **COUNT 25**

11 On or about May 17, 2023, in the County of Orange, the crime of GRAND THEFT, a violation of  
12 PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE FOUNTAIN and  
13 ISAIAH THOMAS, who did willfully and unlawfully take personal property of another of a value  
14 exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Target worth approximately  
15 \$2,099.94.

16 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General  
17 pursuant to Penal Code section 786.5.

18 **COUNT 26**

19 On or about July 6, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation  
20 of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE FOUNTAIN  
21 and KEVIN HAWKINS, who did willfully and unlawfully take personal property of another of a value  
22 exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Walmart worth approximately  
23 \$2,024.00.

24 **COUNT 27**

25 On or about July 15, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation  
26 of PENAL CODE SECTION 487(a), a Felony, was committed by defendant LAWRENCE FOUNTAIN,  
27  
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1 who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty  
2 dollars (\$950), to wit: Merchandise from Target worth approximately \$1,199.98.

3 **COUNT 28**

4 On or about July 21, 2023, in the County of Riverside, the crime of GRAND THEFT, a violation of  
5 PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE FOUNTAIN and  
6 ISAAH THOMAS, who did willfully and unlawfully take personal property of another of a value  
7 exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Walmart worth approximately  
8 \$1,736.00.

9 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General  
10 pursuant to Penal Code section 786.5.

11 **COUNT 29**

12 On or about August 10, 2023, in the County of San Diego, the crime of ATTEMPTED SECOND  
13 DEGREE ROBBERY, a violation of PENAL CODE SECTION 664/211, a Felony, was committed by  
14 defendants LAWRENCE FOUNTAIN and ZANIYAH HOILFIELD, who did unlawfully, and by means of  
15 force or fear take personal property from the person, possession, and immediate presence of   
16

17  
18 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a  
19 violent felony within the meaning of Penal Code Section 667.5(c).

20  
21 NOTICE: Upon a felony conviction, prison custody time is to be served in state prison based upon the  
22 above felony offense being a serious felony as defined in Penal Code section 1192.7(c) and/or a violent  
23 felony as defined in Penal Code section 667.5(c), or a felony offense requiring registration as a sex  
24 offender pursuant to Penal Code section 290(c), within the meaning of Penal Code section 1170(h)(3).

25  
26 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General pursuant to  
27 Penal Code section 786.5.

1 **COUNT 30**

2 On or about August 26, 2023, in the County of San Bernardino, the crime of GRAND THEFT, a  
3 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants LAWRENCE  
4 FOUNTAIN and KEJUAN MORGAN, who did willfully and unlawfully take personal property of another  
5 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Walmart worth  
6 approximately \$2,525.00.

7 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General  
8 pursuant to Penal Code section 786.5.

9  
10 **SPECIAL ALLEGATION 1**

11 **PRIOR SERIOUS FELONY**

12 It is further alleged as to Counts 2 through 4, and 29, pursuant to PENAL CODE SECTION  
13 667(a)(1) that the said Defendant, LAWRENCE FOUNTAIN, has suffered the following prior conviction  
14 of a serious felony:  
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16

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
17 NA099982	PC 211	03/11/15	LOS ANGELES	CA	SUPERIOR
18 NA099982	PC 136.1(C)(1)	03/11/15	LOS ANGELES	CA	SUPERIOR

19

20 **SPECIAL ALLEGATION 2**

21 **ONE OR MORE SERIOUS OR VIOLENT FELONY CONVICTIONS AND CURRENT CHARGE**  
22 **IS ANY FELONY**

23 It is further alleged that prior to the commission of the offenses alleged in Counts 1 through 22, and  
24 24 through 30, the said Defendant, LAWRENCE FOUNTAIN, had been convicted of the following  
25 serious and/or violent felony, as defined in Penal Code section 667(d) and Penal Code section 1170.12(b),  
26 and is thus subject to sentencing pursuant to the provisions of Penal Code section 667(b)-(j) and Penal  
27 Code section 1170.12:  
28

Case No.	Charge Code/Statute	Conv. Date	County of Court	State	Court Type
NA099982	PC 211	03/26/15	LOS ANGELES	CA	SUPERIOR
NA099982	PC 136.1(C)(1)	03/26/15	LOS ANGELES	CA	SUPERIOR

**SPECIAL ALLEGATION 3**

**AGGRAVATING FACTORS AS TO LAWRENCE FOUNTAIN**

As to Counts 1 through 22, and 24 through 30, it is further alleged that the People will seek findings from the jury on factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

Pursuant to **California Rules of Court, Rule 4.421(a)**:

- (a)(8) The manner in which the crimes was carried out indicates planning, sophistication, or professionalism;
- (a)(9) The crimes involved an attempted or actual taking or damage of great monetary value; and
- (a)(10) The crimes involved a large quantity of contraband.

Pursuant to **California Rules of Court, Rule 4.421(b)**:

- (b)(1) The defendant has engaged in violent conduct that indicates a serious danger to society;
- (b)(3) The defendant has served a prior term in prison or county jail under section 1170(h).

**SPECIAL ALLEGATION 4**

**ONE OR MORE SERIOUS OR VIOLENT FELONY CONVICTIONS AND CURRENT CHARGE IS ANY FELONY**

It is further alleged that prior to the commission of the offenses alleged in Counts 1, 16, 18, and 26, the said Defendant, KEVIN HAWKINS, had been convicted of the following serious and/or violent felony, as defined in Penal Code section 667(d) and Penal Code section 1170.12(b), and is thus subject to sentencing pursuant to the provisions of Penal Code section 667(b)-(j) and Penal Code section 1170.12:

Case No.	Charge Code/Statute	Conv. Date	County of Court	State	Court Type
17CR03356	PC 459 + PC 186.22(b)(1)	03/19/18	Santa Barbara	CA	SUPERIOR
17CR03356	PC 186.11(a)	03/19/18	Santa Barbara	CA	SUPERIOR

1 SPECIAL ALLEGATION 5

2 **ONE OR MORE SERIOUS OR VIOLENT FELONY CONVICTIONS AND CURRENT CHARGE**  
3 **IS ANY FELONY**

4 It is further alleged that prior to the commission of the offenses alleged in Counts 1 and 30, the said  
5 Defendant, KEJUAN MORGAN, had been convicted of the following serious and/or violent felony, as  
6 defined in Penal Code section 667(d) and Penal Code section 1170.12(b), and is thus subject to sentencing  
7 pursuant to the provisions of Penal Code section 667(b)-(j) and Penal Code section 1170.12:

8 <u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
9 NA095303	PC 459	12/26/14	LOS ANGELES	CA	SUPERIOR
10 NA101560	PC 459	05/01/15	LOS ANGELES	CA	SUPERIOR

11 SPECIAL ALLEGATION 6

12 **PRIOR SERIOUS FELONY**

13  
14 It is further alleged as to Count 23, pursuant to PENAL CODE SECTION 667(a)(1) that the said  
15 Defendant, ISAIAH THOMAS, has suffered the following prior conviction of a serious felony:

16 <u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
17 17CR03356	PC 459 + PC 186.22(b)(1)	03/19/18	Santa Barbara	CA	SUPERIOR

18  
19 SPECIAL ALLEGATION 7

20 **ONE OR MORE SERIOUS OR VIOLENT FELONY CONVICTIONS AND CURRENT CHARGE**  
21 **IS ANY FELONY**

22 It is further alleged that prior to the commission of the offenses alleged in Counts 1, 11, 13, 23, 25  
23 and 28, the said Defendant, ISAIAH THOMAS, had been convicted of the following serious and/or  
24 violent felony, as defined in Penal Code section 667(d) and Penal Code section 1170.12(b), and is thus  
25 subject to sentencing pursuant to the provisions of Penal Code section 667(b)-(j) and Penal Code section  
26 1170.12:

27 <u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
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3 SPECIAL ALLEGATION 8

4 **AGGRAVATING FACTORS AS TO KEVIN HAWKINS**

5 As to Counts 1, 16, 18, and 26, it is further alleged that the People will seek findings from the jury  
6 on factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

7 Pursuant to **California Rules of Court, Rule 4.421(a)**:

8 (a)(8) The manner in which the crimes was carried out indicates planning, sophistication, or  
9 professionalism;

(a)(9) The crimes involved an attempted or actual taking or damage of great monetary value; and

(a)(10) The crimes involved a large quantity of contraband.

10 Pursuant to **California Rules of Court, Rule 4.421(b)**:

11 (b)(1) The defendant has engaged in violent conduct that indicates a serious danger to society;

12 (b)(3) The defendant has served a prior term in prison or county jail under section 1170(h).

13 SPECIAL ALLEGATION 9

14 **AGGRAVATING FACTORS AS TO ZANIYAH HOILFIELD**

15 As to Counts 1, 5, 9, 10, 13, 15, 17, 19 through 22, 24 and 29, it is further alleged that the People  
16 will seek findings from the jury on factors of aggravation pursuant to **California Rules of Court, Rule**  
17 **4.421** that:

18 Pursuant to **California Rules of Court, Rule 4.421(a)**:

19 (a)(8) The manner in which the crimes was carried out indicates planning, sophistication, or  
20 professionalism;

(a)(9) The crimes involved an attempted or actual taking or damage of great monetary value; and

(a)(10) The crimes involved a large quantity of contraband.

21 SPECIAL ALLEGATION 10

22 **AGGRAVATING FACTORS AS TO KEJUAN MORGAN**

23 As to Counts 1 and 30, it is further alleged that the People will seek findings from the jury on  
24 factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

25 Pursuant to **California Rules of Court, Rule 4.421(a)**:

26 (a)(8) The manner in which the crimes was carried out indicates planning, sophistication, or  
27 professionalism;

(a)(9) The crimes involved an attempted or actual taking or damage of great monetary value; and

(a)(10) The crimes involved a large quantity of contraband.

Pursuant to **California Rules of Court, Rule 4.421(b)**:

(b)(1) The defendant has engaged in violent conduct that indicates a serious danger to society;

(b)(3) The defendant has served a prior term in prison or county jail under section 1170(h).

**SPECIAL ALLEGATION 11**

**AGGRAVATING FACTORS AS TO ISAAH THOMAS**

As to Counts 1, 11, 13, 23, 25 and 28, it is further alleged that the People will seek findings from the jury on factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

Pursuant to **California Rules of Court, Rule 4.421(a)**:

(a)(8) The manner in which the crimes was carried out indicates planning, sophistication, or professionalism;

(a)(9) The crimes involved an attempted or actual taking or damage of great monetary value; and

(a)(10) The crimes involved a large quantity of contraband.

Pursuant to **California Rules of Court, Rule 4.421(b)**:

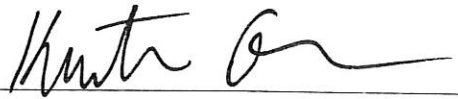
(b)(1) The defendant has engaged in violent conduct that indicates a serious danger to society;

(b)(3) The defendant has served a prior term in prison or county jail under section 1170(h).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 30 COUNTS.

Executed at Los Angeles, County of Los Angeles, on November 1, 2023.

Dated: November 1, 2023

By: 

KRISTINA GANNON  
Deputy Attorney General

For: ROB BONTA  
Attorney General of California

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**NOTICE TO DEFENDANT AND DEFENDANT’S ATTORNEYS**

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

**NOTICE TO ATTORNEYS**

Any materials accompanying this complaint or provided by the People in this case may contain information about witnesses. Such information is subject to Penal Code section 1054.2, which provides, “No attorney may disclose or permit to be disclosed to a defendant 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.”

**NOTICE: Conviction of one or more of these offenses will require the defendant to provide a DNA sample and print impressions pursuant to Penal Code section 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.**