

1 ROB BONTA
Attorney General of California
2 MICHAEL W. WHITAKER
Supervising Deputy Attorney General
3 KRISTINA GANNON
Deputy Attorney General
4 State Bar No. 300723
MANISHA VADGAMA
5 Deputy Attorney General
State Bar No. 276513
6 300 S. Spring Street, Suite 1700
Los Angeles, CA 90013
7 Telephone: [REDACTED]
8 Fax: (916) 523-9665
E-mail: Manisha.Vadgama@doj.ca.gov

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

12
13 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

14 Plaintiff,

15 v.

16 1) ZIONA JANE FAMOSO [REDACTED]
17 [REDACTED]

18 2) JORDAN HARRIS [REDACTED]
19 [REDACTED]

20 3) ALANA HART [REDACTED]
21 [REDACTED]

22 4) JASON JAYLOM SMITH [REDACTED]
23 [REDACTED]

24 Defendants.

Case No. LA092953

FELONY COMPLAINT

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

1 **COUNT 1**

2 On or between August 1, 2023 and August 23, 2023, in the counties of Los Angeles and Riverside,
3 the crime of ORGANIZED RETAIL THEFT, a violation of PENAL CODE SECTION 490.4(a), a Felony,
4 was committed by defendants ZIONA JANEFA FAMOSO, JORDAN HARRIS, ALANA HART, and
5 JASON JAYLOM SMITH, who did unlawfully act in concert with one or more persons to steal
6 merchandise from one or more merchant's premises with the intent to sell, exchange, or return the
7 merchandise for value, in which the violations are committed on two or more separate occasions within a
8 twelve month period, in which the aggregate value of the merchandise stolen, received, purchased or
9 possessed, is in excess of Nine Hundred and Fifty Dollars (\$950), to wit: Merchandise from Burberry,
10 Yves Saint Laurent, and Nordstrom worth approximately \$753,000.00.

11
12 **COUNT 2**

13 On or about August 1, 2023, in the County of Riverside, the crime of SECOND DEGREE
14 BURGLARY, a violation of PENAL CODE SECTION 459, a Felony, was committed by defendants
15 ZIONA JANEFA FAMOSO and ALANA HART, who did enter a commercial establishment during non-
16 business hours with the intent to commit larceny and any felony, to wit: Burberry Outlet Store

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

20
21 **COUNT 3**

22 On or about August 1, 2023, in the County of Riverside, the crime of GRAND THEFT, a violation
23 of PENAL CODE SECTION 487(a), a Felony, was committed by defendants ZIONA JANEFA FAMOSO
24 and ALANA HART, who did willfully and unlawfully take personal property of another of a value
25 exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Burberry Outlet Store worth
26 approximately \$97,000.00.

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

1 **COUNT 4**

2 On or about August 1, 2023, in the County of Riverside, the crime of VANDALISM, a violation of
3 PENAL CODE SECTION 594(a), a Felony, was committed by defendants ZIONA JANEFA FAMOSO and
4 ALANA HART, who did unlawfully and maliciously damage and destroy real and personal property, to
5 wit, Glass windows not their own, belonging to Burberry Outlet store.

6
7 NOTE: Jurisdiction for this offense exists in this court when brought by the Attorney General pursuant to
8 Penal Code section 786.5.

9
10 It is further alleged as to Count 1 that the amount of defacement, damage and destruction is four
11 hundred dollars (\$400) or more, within the meaning of Penal Code section 594(b)(1).

12
13 **COUNT 5**

14 On or about August 7, 2023, in the County of Los Angeles, the crime of CARJACKING, a violation
15 of PENAL CODE SECTION 215(a), a Felony, was committed by defendants JORDAN HARRIS and
16 JASON SMITH, who did unlawfully and by means of force or fear take a motor vehicle in the possession
17 of [REDACTED], from his person and immediate presence, and from the person and immediate
18 presence of a passenger of said motor vehicle, against the will and with the intent to permanently and
19 temporarily deprive [REDACTED] of possession of said motor vehicle.

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

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

1 It is further alleged as to count 4 that in the commission and attempted commission of the above
2 offense, the defendant JORDAN HARRIS personally used a firearm, to wit: handgun, within the meaning
3 of Penal Code section 12022.53(b).

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

7
8 **COUNT 6**

9 On or about August 8, 2023, in the County of Los Angeles, the crime of SECOND DEGREE
10 ROBBERY, a violation of PENAL CODE SECTION 211, a Felony, was committed by defendants
11 ZIONA JANEFA FAMOSO and ALANA HART, who did unlawfully, and by means of force or fear take
12 personal property from the person, possession, and immediate presence of [REDACTED].

13
14 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a
15 violent felony within the meaning of Penal Code Section 667.5(c).

16
17 NOTICE: Upon a felony conviction, prison custody time is to be served in state prison based upon the
18 above felony offense being a serious felony as defined in Penal Code section 1192.7(c) and/or a violent
19 felony as defined in Penal Code section 667.5(c), or a felony offense requiring registration as a sex
20 offender pursuant to Penal Code section 290(c), within the meaning of Penal Code section 1170(h)(3).

21
22 **COUNT 7**

23 On or about August 8, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a
24 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants ZIONA JANEFA
25 FAMOSO and ALANA HART, who did willfully and unlawfully take personal property of another of a
26 value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Yves Saint Laurent worth
27 approximately \$300,000.00.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT 8

On or about August 12, 2023, in the County of Los Angeles, the crime of SECOND DEGREE ROBBERY, a violation of PENAL CODE SECTION 211, a Felony, was committed by defendants ZIONA JANEFA FAMOSO, JORDAN HARRIS, and ALANA HART, who did unlawfully, and by means of force or fear take personal property from the person, possession, and immediate presence of [REDACTED].

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

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

COUNT 9

On or about August 12, 2023, in the County of Los Angeles, the crime of SECOND DEGREE ROBBERY, a violation of PENAL CODE SECTION 211, a Felony, was committed by defendants ZIONA JANEFA FAMOSO, JORDAN HARRIS, and ALANA HART, who did unlawfully, and by means of force or fear take personal property from the person, possession, and immediate presence of [REDACTED].

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

NOTICE: Upon a felony conviction, prison custody time is to be served in state prison based upon the above felony offense being a serious felony as defined in Penal Code section 1192.7(c) and/or a violent

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 10**

5 On or about August 12, 2023, in the County of Los Angeles, the crime of SECOND DEGREE
6 ROBBERY, a violation of PENAL CODE SECTION 211, a Felony, was committed by defendants
7 ZIONA JANEAM FAMOSO, JORDAN HARRIS, and ALANA HART, who did unlawfully, and by means
8 of force or fear take personal property from the person, possession, and immediate presence of [REDACTED]
9 [REDACTED]

10
11 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a
12 violent felony within the meaning of Penal Code Section 667.5(c).

13
14 NOTICE: Upon a felony conviction, prison custody time is to be served in state prison based upon the
15 above felony offense being a serious felony as defined in Penal Code section 1192.7(c) and/or a violent
16 felony as defined in Penal Code section 667.5(c), or a felony offense requiring registration as a sex
17 offender pursuant to Penal Code section 290(c), within the meaning of Penal Code section 1170(h)(3).

18
19 **COUNT 11**

20 On or about August 12, 2023, in the County of Los Angeles, the crime of SECOND DEGREE
21 ROBBERY, a violation of PENAL CODE SECTION 211, a Felony, was committed by defendants
22 ZIONA JANEAM FAMOSO, JORDAN HARRIS, and ALANA HART, who did unlawfully, and by means
23 of force or fear take personal property from the person, possession, and immediate presence of [REDACTED]
24 [REDACTED].

25
26 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a
27 violent felony within the meaning of Penal Code Section 667.5(c).

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

5
6 **COUNT 12**

7 On or about August 12, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a
8 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants ZIONA JANE A
9 FAMOSO, JORDAN HARRIS, and ALANA HART, who did willfully and unlawfully take personal
10 property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from
11 Nordstrom worth approximately \$356,000.00.

12
13 **COUNT 13**

14 On or about August 12, 2023, in the County of Los Angeles, the crime of VANDALISM, a
15 violation of PENAL CODE SECTION 594(a), a Felony, was committed by defendants ZIONA JANE A
16 FAMOSO, JORDAN HARRIS, and ALANA HART, who did unlawfully and maliciously damage and
17 destroy real and personal property, to wit, Furniture belonging to Nordstrom.

18
19 It is further alleged as to Count 1 that the amount of defacement, damage and destruction is four
20 hundred dollars (\$400) or more, within the meaning of Penal Code section 594(b)(1).

21
22 **COUNT 14**

23 On or about August 23, 2023, in the County of Los Angeles, the crime of UNLAWFUL
24 POSSESSION OF AMMUNITION, a violation of PENAL CODE SECTION 30305(a)(1), a Felony, was
25 committed by defendant JASON JAYLOM SMITH, who did own, possess, and have under his control
26 ammunition and reloaded ammunition and is prohibited from owning and possessing a firearm for having
27 been previously convicted of the following offense(s):
28

1 Case No. Charge Code/Statute Conv. Date County of Court State Court Type
2 BA512056 PC 487(a) 06/07/23 LOS ANGELES CA SUPERIOR

3
4 NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in state
5 prison pursuant to Penal Code section 1170.

6
7 **SPECIAL ALLEGATION 1**

8 **FELONY OFFENSE WHILE OUT ON BAIL OR OWN RECOGNIZANCE**

9 It is further alleged as to Counts 1 through 4 and 6 through 13, that at the time of the commission of
10 the above offense, the said Defendant, ALANA HART, was released from custody on bail or on her own
11 recognizance in Los Angeles County Case Number BA513658, within the meaning of PENAL CODE
12 SECTION 12022.1.

13 **SPECIAL ALLEGATION 2**

14 **FELONY OFFENSE WHILE OUT ON BAIL OR OWN RECOGNIZANCE**

15 It is further alleged as to Counts 1 through 4 and 6 through 13, that at the time of the commission of
16 the above offense, the said Defendant, ALANA HART, was released from custody on bail or on her own
17 recognizance in Los Angeles County Case Number SA108483, within the meaning of PENAL CODE
18 SECTION 12022.1.

19 **SPECIAL ALLEGATION 3**

20 **FELONY OFFENSE WHILE OUT ON BAIL OR OWN RECOGNIZANCE**

21 It is further alleged as to Counts 1, 5 and 14, that at the time of the commission of the above
22 offense, the said Defendant, JASON JAYLOM SMITH, was released from custody on bail or on her own
23 recognizance in Los Angeles County Case Number SA108483, within the meaning of PENAL CODE
24 SECTION 12022.1.

25 **SPECIAL ALLEGATION 4**

26 **AGGRAVATED WHITE COLLAR CRIME – LOSS > \$500,000**

27 As to Counts 3, 7, and 12, it is further alleged that in the commission of the above offenses, the said
28 defendants, ZIONA JANEFA FAMOSO and ALANA HART, violated PENAL CODE SECTION

1 186.11(a)(2), in that the offenses set forth in Counts 3, 7, and 12 are related felonies, a material element of
2 which is fraud and embezzlement, which involves a pattern of related felony conduct, and the pattern of
3 related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

4 NOTICE: Pursuant to Penal Code section 1170(h), prison custody time is to be served in state
5 prison if the enhancement pursuant to Penal Code section 186.22 is imposed as part of the sentence for the
6 above offense.

7 **SPECIAL ALLEGATION 5**

8 **AGGRAVATING FACTORS AS TO ZIONA JANEA FAMOSO**

9 As to Counts 1 through 4 and 6 through 13, it is further alleged that the People will seek findings
10 from the jury on factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

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

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

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

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

15 **SPECIAL ALLEGATION 6**

16 **AGGRAVATING FACTORS AS TO JORDAN HARRIS**

17 As to Counts 5 and 8 through 13, it is further alleged that the People will seek findings from the jury
18 on factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

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

20 (a)(2) The defendant was armed with or used a weapon at the time of the commission of the crime;

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

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

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

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

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

26 **SPECIAL ALLEGATION 7**

27 **AGGRAVATING FACTORS AS TO ALANA HART**

28 As to Counts 1 through 4 and 6 through 13, 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:

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

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

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

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

6 **SPECIAL ALLEGATION 8**

7 **AGGRAVATING FACTORS AS TO JASON JAYLOM SMITH**

8 As to Counts 1, 5 and 14, it is further alleged that the People will seek findings from the jury on
9 factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

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

11 (a)(2) The defendant was armed with or used a weapon at the time of the commission of the crime;

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

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

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

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

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

18 (b)(4) The defendant was on probation, mandatory supervision, postrelease community supervision,
19 or parole when the crime was committed

20 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND
21 CORRECT AND THAT THIS COMPLAINT CONSISTS OF 14 COUNTS.

22 Executed at Los Angeles, County of Los Angeles, on August 25, 2023.

23 Dated: August 25, 2023

24 By: _____

25 MANISHA VADGAMA
26 Deputy Attorney General

27 For: ROB BONTA
28 Attorney General of California

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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.

1 AGENCY: LAPD I/O: Det. Kimberly Santander PHONE NO: [REDACTED]

2 DR NO: _232100750_____ OPERATOR: PRELIM TIME EST: 1 day

3

4 <u>DEFENDANT(S)</u>	<u>CII No.</u>	<u>DOB</u>	<u>BOOKING NUMBER</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY RET DATE</u>
5 Ziona Famoso	A40481076	09/15/04	6664719	\$1,000,000	
6 Jordan Harris	A38027522	11/22/04	6664650	\$1,000,000	
7 Alana Hart	A40109977	12/14/04	6664601	\$2,000,000	
8 Jason Smith	A37888362	01/12/05	6664662	\$1,000,000	

9

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Order Holding to Answer – Felony Complaint (PC § 872)

It appearing to me from the evidence presented, that the following offense(s) has/have been committed, and that there is sufficient evidence to believe that the following defendant(s) guilty thereof, to wit:

ZIONA FAMOSO

Ct.	Charge	Charge Range	Allegation	Alleg. Effect
1	PC 490.4	16-2-3		
2	PC 459	16-2-3		
3	PC 487(a)	16-2-3		
4	PC 594(a)	16-2-3		
6	PC 211	2-3-5		
7	PC 487(a)	16-2-3		
8	PC 211	2-3-5		
9	PC 211	2-3-5		
10	PC 211	2-3-5		
11	PC 211	2-3-5		
12	PC 487(a)	16-2-3		
13	PC 594(a)	16-2-3		
			PC 186.11(a)(3)	+2-3-5 yr CDC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Order Holding to Answer – Felony Complaint (PC § 872)

It appearing to me from the evidence presented, that the following offense(s) has/have been committed, and that there is sufficient evidence to believe that the following defendant(s) guilty thereof, to wit:

JORDAN HARRIS

Ct.	Charge	Charge Range	Allegation	Alleg. Effect
1	PC 490.4	16-2-3		
5	PC 215	3-5-9	PC 12022.53(b)	10 yrs
8	PC 211	2-3-5		
9	PC 211	2-3-5		
10	PC 211	2-3-5		
11	PC 211	2-3-5		
12	PC 487(a)	16-2-3		
13	PC 594(a)	16-2-3		

1 **Order Holding to Answer – Felony Complaint (PC § 872)**

2 It appearing to me from the evidence presented, that the following offense(s) has/have
3 been committed, and that there is sufficient evidence to believe that the following defendant(s)
4 guilty thereof, to wit:

5 **ALANA HART**

6

Ct.	Charge	Charge Range	Allegation	Alleg. Effect
7 1	PC 490.4	16-2-3		
8 2	PC 459	16-2-3		
9 3	PC 487(a)	16-2-3		
6 4	PC 594(a)	16-2-3		
10 6	PC 211	2-3-5		
11 7	PC 487(a)	16-2-3		
12 8	PC 211	2-3-5		
13 9	PC 211	2-3-5		
14 10	PC 211	2-3-5		
15 11	PC 211	2-3-5		
16 12	PC 487(a)	16-2-3		
17 13	PC 594(a)	16-2-3		
			PC 12022.1	+ 2 yrs
			PC 12022.1	+ 2 yrs
			PC 186.11(a)(3)	+2-3-5 yr CDC

18
19
20
21
22
23
24
25
26
27
28

1 **Order Holding to Answer – Felony Complaint (PC § 872)**

2 It appearing to me from the evidence presented, that the following offense(s) has/have
3 been committed, and that there is sufficient evidence to believe that the following defendant(s)
4 guilty thereof, to wit:

5 **JASON SMITH**

6

Ct.	Charge	Charge Range	Allegation	Alleg. Effect
7 1	PC 490.4	16-2-3		
8 5	PC 215	3-5-9		
9 14	PC 30305(a)(1)	16-2-3		
			PC 12022.1	+ 2 yrs

10
11
12 I ORDER that the defendant(s) named below be held to answer for the above-described
13 offense(s) and allegation(s) and be admitted to bail in the sum(s) of:

14 Zioana Famoso \$ _____
15 Jordan Harris \$ _____
16 Alana Hart \$ _____
17 Jason Smith \$ _____
18

19 And that said defendant(s) be committed to the custody of the Sheriff of Los Angeles
20 County until such bail is given. The date of felony arraignment is set for:

21 _____ in Department _____ at _____ a.m./p.m.
22 (Date)

23 _____
24
25 Magistrate Date
26
27
28