

3/7/2025

K. BIEKER, CLERK OF THE COURT
SUPERIOR COURT OF CALIFORNIA
COUNTY OF CONTRA COSTA
cmcnally

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF CONTRA COSTA

PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff.

v.

ADAEZIE NGOZI KINGS,
A.K.A. ADAEZIE NGOZI ATUEYICHUKWU
A.K.A. DAISY KINGS
A.K.A. FLORENCE EGWUATU

Defendant.

Case No. **01-25-00969**

FELONY COMPLAINT

[AG Docket No. SF2022302965]

The People of the State of California hereby allege that in the County of Contra Costa, State of California, and elsewhere, within the State of California, before the making of this criminal complaint, the above-named defendant, **ADAEZIE NGOZI KINGS** [REDACTED] committed the following different criminal offenses all connected together in their commission, and being two or more different offenses of the same class of crimes or offenses, under separate counts:

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COUNT 1
Penal Code § 368(d) -a Felony
Grand Theft from an Elder or Dependent Adult - 2, 3, or 4 years PC 1170(h)

On or about and between May 12, 2021 and September 29, 2021, the defendant, **ADAEZIE NGOZI KINGS** did unlawfully commit theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, money, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, S.W., was an elder and dependent adult.

COUNT 2
Penal Code § 484g(a) -a Felony
Grand Theft By Access Card - 16 mos., 2 or 3 years PC 1170(h)

On or about and between May 12, 2021 and September 29, 2021, the defendant, **ADAEZIE NGOZI KINGS** did, with the intent to defraud, use, for the purpose of obtaining money, goods, services, and something of value, an access card and access card account information that has been altered, obtained, and retained in violation of Penal Code section 484e and 484f, and an access card which he/she knows was forged, expired, and revoked to obtain money, goods, services, and something else of value by representing without the consent of the cardholder that he/she is the holder of an access card and the card had not in fact been issued.

It is further alleged that the value of all money, goods, services, and other things so obtained exceeded nine hundred fifty dollars (\$950) in a consecutive six-month period.

SPECIAL ALLEGATION – Penal Code § 801.5
STATUTE OF LIMITATIONS FOR PC 803(C) OFFENSES

It is further alleged that the above offense(s) charged in Count 1 and Count 2, are described in Penal Code section 803(c) and prosecution was commenced within four years after the discovery of the commission of the offense(s) and after the completion of the offense(s), within the meaning of Penal Code section 801.5.

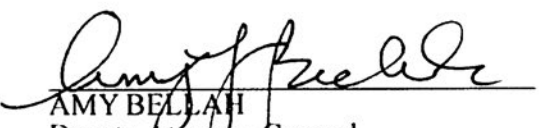
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Further, attached and incorporated by reference is an Affidavit in Support of Arrest Warrant and Complaint completed by a sworn peace officer from the California Department of Justice which the complainant believes establishes probable cause for the arrest of defendant ADAEZIE NGOZI KINGS for the above listed crimes. Wherefore, A WARRANT OF ARREST IS REQUESTED.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 4, 2025, at Sacramento, Sacramento County, California.

Dated: March 4, 2025

Respectfully Submitted,
ROB BONTA
Attorney General of California


AMY BELLAH
Deputy Attorney General
Attorney for The People of the State of California

HOLDING ORDER

Defendant ADAEZIE NGOZI KINGS:

Based on the evidence presented at the preliminary hearing, it appears that the following offenses charged in the above Complaint have been committed and there is sufficient cause to believe Defendant ADAEZIE NGOZI KINGS is guilty of these offenses.

Defendant has waived preliminary hearing of the offenses charged in the above complaint. Exceptions/Additions/Conditions: _____

IT IS ORDERED, pursuant to Penal Code section 872, it appearing that the offense(s) in the within complaint have been committed, and that there is sufficient cause to believe that the Defendant is guilty and held to answer to the following offenses:

COUNT	CHARGE	CHARGE RANGE
1	Penal Code §368(d), Felony	2, 3 or 4 years
2	Penal Code § 484g(a), Felony	16 months, 2 or 3 years

Dated this ____ day of _____, 20____

JUDGE OF THE SUPERIOR COURT