

TULARE COUNTY SUPERIOR COURT DISTRICT
PORTERVILLE DIVISION, STATE OF CALIFORNIA

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| THE PEOPLE OF THE STATE OF CALIFORNIA | DA No. 24-0019707 |
| Plaintiff, | Court No. |
| vs. | FELONY COMPLAINT |
| ALISA R LEWIS DOB: 03/11/1992 | |
| DOMONIQUE DAVONE ELDRIDGE DOB: 05/23/1991 AKA: DOMINIC DAYON ELDRIDGE DOB: 05/23/1991 AKA: DAVONE DARNELL DOMONIQUE ELDRIDGE DOB: 05/23/1991 AKA: DOMINIQUE ELDRIDGE DOB: 05/23/1991 | |
| MARQUIS DESHAWN LORING DOB: 06/16/1993 | |
| THOMAS ALEXANDER BROWNING DOB: 02/20/1999 | |
| Defendant(s). | |

The undersigned is informed and believes that:

COUNT 1

On or about June 14, 2024, in the County of Tulare, the crime of MAINTAINING PLACE FOR SELLING OR USING CONTROLLED SUBSTANCE, in violation of HEALTH AND SAFETY CODE SECTION 11366, a Felony, was committed by ALISA R LEWIS & DOMONIQUE DAVONE ELDRIDGE, who did unlawfully open and maintain a place for the purpose of unlawfully selling, giving away, and using a controlled substance, to wit, cannabis.

SPEC ALLEG-OFFENSE WHILE ON BAIL OR O.R.

It is further alleged as to count(s) 1-5 that at the time of the commission of the above offense, the defendant(s) DOMONIQUE DAVONE ELDRIDGE, was released from custody on bail or Own Recognizance in Case Number VCF439621B within the meaning of Penal Code section 12022.1.

SPEC ALLEG - USE OF WEAPON BOTH DEFENDANTS

It is further alleged as to count(s) 1-11 that the defendant(s) was armed with or used a weapon, to wit AR15 Style Pistol, Franklin Armory AR15 Style Rifle, P80 AR15 Style Rifle, at the time of the commission of the crime within the meaning of California Rules of Court Rule 4.421(a)(2).

SPEC ALLEG - PLANNING, SOPHISTICATION, PROFESSIONALISM BOTH DEFENDANTS

It is further alleged that the manner in which the defendant(s) carried out the crime(s) alleged in count(s) 1-11 indicate(s) planning, sophistication, and professionalism within the meaning of California Rules of Court Rule 4.421(a)(8).

SPEC ALLEG - LARGE QUANTITY OF CONTRABAND BOTH DEFENDANTS

It is further alleged that the crime(s) alleged in count(s) 1-11 involved a large quantity of contraband within the meaning of California Rules of Court Rule 4.421(a)(10).

SPEC ALLEG - INDEPENDENT CRIMES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(1) that the crimes and objectives as alleged in this indictment were predominantly independent of each other.

SPEC ALLEG - DIFFERENT TIMES OR SEPARATE PLACES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(3) that the crimes were committed at different times and separate places, rather than being committed so closely in time and place as to indicate a single period of aberrant behavior.

COUNT 2

On or about June 14, 2024, in the County of Tulare, the crime of POSSESSION OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION 30605(A), a Felony, was committed by ALISA R LEWIS & DOMONIQUE DAVONE ELDRIDGE, who did unlawfully possess an assault weapon, to wit: AR15 Style Pistol.

SPEC ALLEG-OFFENSE WHILE ON BAIL OR O.R.

It is further alleged as to count(s) 1-5 that at the time of the commission of the above offense, the defendant(s) DOMONIQUE DAVONE ELDRIDGE, was released from custody on bail or Own Recognizance in Case Number VCF439621B within the meaning of Penal Code section 12022.1.

SPEC ALLEG - USE OF WEAPON BOTH DEFENDANTS

It is further alleged as to count(s) 1-11 that the defendant(s) was armed with or used a weapon, to wit AR15 Style Pistol, Franklin Armory AR15 Style Rifle, P80 AR15 Style Rifle, at the time of the commission of the crime within the meaning of California Rules of Court Rule 4.421(a)(2).

SPEC ALLEG - PLANNING, SOPHISTICATION, PROFESSIONALISM BOTH DEFENDANTS

It is further alleged that the manner in which the defendant(s) carried out the crime(s) alleged in count(s) 1-11 indicate(s) planning, sophistication, and professionalism within the meaning of California Rules of Court Rule 4.421(a)(8).

SPEC ALLEG - LARGE QUANTITY OF CONTRABAND BOTH DEFENDANTS

It is further alleged that the crime(s) alleged in count(s) 1-11 involved a large quantity of contraband within the meaning of California Rules of Court Rule 4.421(a)(10).

SPEC ALLEG - INDEPENDENT CRIMES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(1) that the crimes and objectives as alleged in this indictment were predominantly independent of each other.

SPEC ALLEG - DIFFERENT TIMES OR SEPARATE PLACES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(3) that the crimes were committed at different times and separate places, rather than being committed so closely in time and place as to indicate a single period of aberrant behavior.

COUNT 3

On or about June 14, 2024, in the County of Tulare, the crime of POSSESSION OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION 30605(A), a Felony, was committed by ALISA R LEWIS & DOMONIQUE DAVONE ELDRIDGE, who did unlawfully possess an assault weapon, to wit: Franklin Armory AR15 Style Rifle.

SPEC ALLEG-OFFENSE WHILE ON BAIL OR O.R.

It is further alleged as to count(s) 1-5 that at the time of the commission of the above offense, the defendant(s) DOMONIQUE DAVONE ELDRIDGE, was released from custody on bail or Own Recognizance in Case Number VCF439621B within the meaning of Penal Code section 12022.1.

SPEC ALLEG - USE OF WEAPON BOTH DEFENDANTS

It is further alleged as to count(s) 1-11 that the defendant(s) was armed with or used a weapon, to wit AR15 Style Pistol, Franklin Armory AR15 Style Rifle, P80 AR15 Style Rifle, at the time of the commission of the crime within the meaning of California Rules of Court Rule 4.421(a)(2).

SPEC ALLEG - PLANNING, SOPHISTICATED, PROFESSIONALISM BOTH DEFENDANTS

It is further alleged that the manner in which the defendant(s) carried out the crime(s) alleged in count(s) 1-11 indicate(s) planning, sophistication, and professionalism within the meaning of California Rules of Court Rule 4.421(a)(8).

SPEC ALLEG - LARGE QUANTITY OF CONTRABAND BOTH DEFENDANTS

It is further alleged that the crime(s) alleged in count(s) 1-11 involved a large quantity of contraband within the meaning of California Rules of Court Rule 4.421(a)(10).

SPEC ALLEG - INDEPENDENT CRIMES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(1) that the crimes and objectives as alleged in this indictment were predominantly independent of each other.

SPEC ALLEG - DIFFERENT TIMES OR SEPARATE PLACES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(3) that the crimes were committed at different times and separate places, rather than being committed so closely in time and place as to indicate a single period of aberrant behavior

COUNT 4

On or about June 14, 2024, in the County of Tulare, the crime of POSSESSION OF A SHORT-BARRELED RIFLE OR SHOTGUN, in violation of PENAL CODE SECTION 33215, a Felony, was committed by ALISA R LEWIS & DOMONIQUE DAVONE ELDRIDGE, who did unlawfully manufacture, cause to be manufactured, import into the State of California, keep for sale, offer and expose for sale, and give, lend, and possess an instrument and weapon of the kind commonly known as short barreled rifle and a short-barreled shotgun.

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SPEC ALLEG-OFFENSE WHILE ON BAIL OR O.R.

It is further alleged as to count(s) 1-5 that at the time of the commission of the above offense, the defendant(s) DOMONIQUE DAVONE ELDRIDGE, was released from custody on bail or Own Recognizance in Case Number VCF439621B within the meaning of Penal Code section 12022.1.

SPEC ALLEG - USE OF WEAPON BOTH DEFENDANTS

It is further alleged as to count(s) 1-11 that the defendant(s) was armed with or used a weapon, to wit AR15 Style Pistol, Franklin Armory AR15 Style Rifle, P80 AR15 Style Rifle, at the time of the commission of the crime within the meaning of California Rules of Court Rule 4.421(a)(2).

SPEC ALLEG - PLANNING, SOPHISTICATION, PROFESSIONALISM BOTH DEFENDANTS

It is further alleged that the manner in which the defendant(s) carried out the crime(s) alleged in count(s) 1-11 indicate(s) planning, sophistication, and professionalism within the meaning of California Rules of Court Rule 4.421(a)(8).

SPEC ALLEG - LARGE QUANTITY OF CONTRABAND BOTH DEFENDANTS

It is further alleged that the crime(s) alleged in count(s) 1-11 involved a large quantity of contraband within the meaning of California Rules of Court Rule 4.421(a)(10).

SPEC ALLEG - INDEPENDENT CRIMES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(1) that the crimes and objectives as alleged in this indictment were predominantly independent of each other.

SPEC ALLEG - DIFFERENT TIMES OR SEPARATE PLACES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(3) that the crimes were committed at different times and separate places, rather than being committed so closely in time and place as to indicate a single period of aberrant behavior.

COUNT 5

On or about June 14, 2024, in the County of Tulare, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273A(A), a Felony, was committed by ALISA R LEWIS & DOMONIQUE DAVONE ELDRIDGE, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, AE, DE & XE, to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that their person and health was/were endangered.

SPEC ALLEG-OFFENSE WHILE ON BAIL OR O.R.

It is further alleged as to count(s) 1-5 that at the time of the commission of the above offense, the defendant(s) DOMONIQUE DAVONE ELDRIDGE, was released from custody on bail or Own Recognizance in Case Number VCF439621B within the meaning of Penal Code section 12022.1.

SPEC ALLEG - USE OF WEAPON BOTH DEFENDANTS

It is further alleged as to count(s) 1-11 that the defendant(s) was armed with or used a weapon, to wit AR15 Style Pistol, Franklin Armory AR15 Style Rifle, P80 AR15 Style Rifle, at the time of the commission of the crime within the meaning of California Rules of Court Rule 4.421(a)(2).

SPEC ALLEG - PLANNING, SOPHISTICATION, PROFESSIONALISM BOTH DEFENDANTS

It is further alleged that the manner in which the defendant(s) carried out the crime(s) alleged in count(s) 1-11 indicate(s) planning, sophistication, and professionalism within the meaning of California Rules of Court Rule 4.421(a)(8).

SPEC ALLEG - LARGE QUANTITY OF CONTRABAND BOTH DEFENDANTS

It is further alleged that the crime(s) alleged in count(s) 1-11 involved a large quantity of contraband within the meaning of California Rules of Court Rule 4.421(a)(10).

SPEC ALLEG - INDEPENDENT CRIMES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(1) that the crimes and objectives as alleged in this indictment were predominantly independent of each other.

SPEC ALLEG - DIFFERENT TIMES OR SEPARATE PLACES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(3) that the crimes were committed at different times and separate places, rather than being committed so closely in time and place as to indicate a single period of aberrant behavior.

COUNT 6

On or about June 14, 2024, in the County of Tulare, the crime of MAINTAINING PLACE FOR SELLING OR USING CONTROLLED SUBSTANCE, in violation of HEALTH AND SAFETY CODE SECTION 11366, a Felony, was committed by MARQUIS DESHAWN LORING & THOMAS ALEXANDER BROWNING, who did unlawfully open and maintain a place for the purpose of unlawfully selling, giving away, and using a controlled substance, to wit, cannabis, MDMA, psilocybin.

SPEC ALLEG-OFFENSE WHILE ON BAIL OR O.R.

It is further alleged as to count(s) 6-9 that at the time of the commission of the above offense, the defendant(s) MARQUIS DESHAWN LORING, was released from custody on bail or Own Recognizance in Case Number VCF439621A within the meaning of Penal Code section 12022.1.

SPEC ALLEG - USE OF WEAPON BOTH DEFENDANTS

It is further alleged as to count(s) 1-11 that the defendant(s) was armed with or used a weapon, to wit AR15 Style Pistol, Franklin Armory AR15 Style Rifle, P80 AR15 Style Rifle, at the time of the commission of the crime within the meaning of California Rules of Court Rule 4.421(a)(2).

SPEC ALLEG - PLANNING, SOPHISTICATION, PROFESSIONALISM BOTH DEFENDANTS

It is further alleged that the manner in which the defendant(s) carried out the crime(s) alleged in count(s) 1-11 indicate(s) planning, sophistication, and professionalism within the meaning of California Rules of Court Rule 4.421(a)(8).

SPEC ALLEG - LARGE QUANTITY OF CONTRABAND BOTH DEFENDANTS

It is further alleged that the crime(s) alleged in count(s) 1-11 involved a large quantity of contraband within the meaning of California Rules of Court Rule 4.421(a)(10).

SPEC ALLEG - INDEPENDENT CRIMES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(1) that the crimes and objectives as alleged in this indictment were predominantly independent of each other.

SPEC ALLEG - DIFFERENT TIMES OR SEPARATE PLACES

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(3) that the crimes were committed at different times and separate places, rather than being committed so closely in time and place as to indicate a single period of aberrant

COUNT 7

On or about June 14, 2024, in the County of Tulare, the crime of POSSESSION FOR SALE OF A CONTROLLED SUBSTANCE, in violation of HEALTH AND SAFETY CODE SECTION 11378, a Felony, was committed by MARQUIS DESHAWN LORING & THOMAS ALEXANDER BROWNING, who did unlawfully possess for purpose of sale a controlled substance, to wit, Psilocybin.

SPEC ALLEG-OFFENSE WHILE ON BAIL OR O.R.

It is further alleged as to count(s) 6-9 that at the time of the commission of the above offense, the defendant(s) MARQUIS DESHAWN LORING, was released from custody on bail or Own Recognizance in Case Number VCF439621A within the meaning of Penal Code section 12022.1

SPEC ALLEG-PERSONALLY ARMED/FIREARM CONTROLLED SUBSTANCES

It is further alleged as to count(s) 7-9 that in the commission and attempted commission of the above offense the defendant(s) THOMAS ALEXANDER BROWNING was/were personally armed with a firearm within the meaning of Penal Code section 12022(c).

SPEC ALLEG-PRINCIPAL ARMED/FIREARM CONTROLLED SUBSTANCES

It is further alleged pursuant to Penal Code 12022(d) as to count(s) 7-9 that a principal was armed with a firearm during the commission of the above offense and that defendant(s) MARQUIS DESHAWN LORING, not personally armed, knew that a principal was personally armed with a firearm.

SPEC ALLEG - USE OF WEAPON BOTH DEFENDANTS

It is further alleged as to count(s) 1-11 that the defendant(s) was armed with or used a weapon, to wit AR15 Style Pistol, Franklin Armory AR15 Style Rifle, P80 AR15 Style Rifle, at the time of the commission of the crime within the meaning of California Rules of Court Rule 4.421(a)(2).

SPEC ALLEG - PLANNING, SOPHISTICATION, PROFESSIONALISM BOTH DEFENDANTS

It is further alleged that the manner in which the defendant(s) carried out the crime(s) alleged in count(s) 1-11 indicate(s) planning, sophistication, and professionalism within the meaning of California Rules of Court Rule 4.421(a)(8).

SPEC ALLEG - LARGE QUANTITY OF CONTRABAND BOTH DEFENDANTS

It is further alleged that the crime(s) alleged in count(s) 1-11 involved a large quantity of contraband within the meaning of California Rules of Court Rule 4.421(a)(10).

SPEC ALLEG - INDEPENDENT CRIMES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(1) that the crimes and objectives as alleged in this indictment were predominantly independent of each other.

SPEC ALLEG - DIFFERENT TIMES OR SEPARATE PLACES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(3) that the crimes were committed at different times and separate places, rather than being committed so closely in time and place as to indicate a single period of aberrant

COUNT 8

On or about June 14, 2024, in the County of Tulare, the crime of POSSESSION FOR SALE OF A CONTROLLED SUBSTANCE, in violation of HEALTH AND SAFETY CODE SECTION 11378, a Felony, was committed by MARQUIS DESHAWN LORING & THOMAS ALEXANDER BROWNING, who did unlawfully possess for purpose of sale a controlled substance, to wit, MDMA.

SPEC ALLEG-OFFENSE WHILE ON BAIL OR O.R.

It is further alleged as to count(s) 6-9 that at the time of the commission of the above offense, the defendant(s) MARQUIS DESHAWN LORING, was released from custody on bail or Own Recognizance in Case Number VCF439621A within the meaning of Penal Code section 12022.1

SPEC ALLEG-PERSONALLY ARMED/FIREARM CONTROLLED SUBSTANCES

It is further alleged as to count(s) 7-9 that in the commission and attempted commission of the above offense the defendant(s) THOMAS ALEXANDER BROWNING was/were personally armed with a firearm within the meaning of Penal Code section 12022(c).

SPEC ALLEG-PRINCIPAL ARMED/FIREARM CONTROLLED SUBSTANCES

It is further alleged pursuant to Penal Code 12022(d) as to count(s) 7-9 that a principal was armed with a firearm during the commission of the above offense and that defendant(s) MARQUIS DESHAWN LORING, not personally armed, knew that a principal was personally armed with a firearm.

SPEC ALLEG - USE OF WEAPON BOTH DEFENDANTS

It is further alleged as to count(s) 1-11 that the defendant(s) was armed with or used a weapon, to wit AR15 Style Pistol, Franklin Armory AR15 Style Rifle, P80 AR15 Style Rifle, at the time of the commission of the crime within the meaning of California Rules of Court Rule 4.421(a)(2).

SPEC ALLEG - PLANNING, SOPHISTICATION, PROFESSIONALISM BOTH DEFENDANTS

It is further alleged that the manner in which the defendant(s) carried out the crime(s) alleged in count(s) 1-11 indicate(s) planning, sophistication, and professionalism within the meaning of California Rules of Court Rule 4.421(a)(8).

SPEC ALLEG - LARGE QUANTITY OF CONTRABAND BOTH DEFENDANTS

It is further alleged that the crime(s) alleged in count(s) 1-11 involved a large quantity of contraband within the meaning of California Rules of Court Rule 4.421(a)(10).

SPEC ALLEG - INDEPENDENT CRIMES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(1) that the crimes and objectives as alleged in this indictment were predominantly independent of each other.

SPEC ALLEG - DIFFERENT TIMES OR SEPARATE PLACES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(3) that the crimes were committed at different times and separate places, rather than being committed so closely in time and place as to indicate a single period of aberrant

COUNT 9

On or about June 14, 2024, in the County of Tulare, the crime of POSSESSION FOR SALE OF A CONTROLLED SUBSTANCE, in violation of HEALTH AND SAFETY CODE SECTION 11351, a Felony, was committed by MARQUIS DESHAWN LORING & THOMAS ALEXANDER BROWNING, who did unlawfully possess for sale and purchase for sale a controlled substance, to wit, codeine.

SPEC ALLEG-OFFENSE WHILE ON BAIL OR O.R.

It is further alleged as to count(s) 6-9 that at the time of the commission of the above offense, the defendant(s) MARQUIS DESHAWN LORING, was released from custody on bail or Own Recognizance in Case Number VCF439621A within the meaning of Penal Code section 12022.1

SPEC ALLEG-PERSONALLY ARMED/FIREARM CONTROLLED SUBSTANCES

It is further alleged as to count(s) 7-9 that in the commission and attempted commission of the above offense the defendant(s) THOMAS ALEXANDER BROWNING was/were personally armed with a firearm within the meaning of Penal Code section 12022(c).

SPEC ALLEG-PRINCIPAL ARMED/FIREARM CONTROLLED SUBSTANCES

It is further alleged pursuant to Penal Code 12022(d) as to count(s) 7-9 that a principal was armed with a firearm during the commission of the above offense and that defendant(s) MARQUIS DESHAWN LORING, not personally armed, knew that a principal was personally armed with a firearm.

SPEC ALLEG - USE OF WEAPON BOTH DEFENDANTS

It is further alleged as to count(s) 1-11 that the defendant(s) was armed with or used a weapon, to wit AR15 Style Pistol, Franklin Armory AR15 Style Rifle, P80 AR15 Style Rifle, at the time of the commission of the crime within the meaning of California Rules of Court Rule 4.421(a)(2).

SPEC ALLEG - PLANNING, SOPHISTICATION, PROFESSIONALISM BOTH DEFENDANTS

It is further alleged that the manner in which the defendant(s) carried out the crime(s) alleged in count(s) 1-11 indicate(s) planning, sophistication, and professionalism within the meaning of California Rules of Court Rule 4.421(a)(8).

SPEC ALLEG - LARGE QUANTITY OF CONTRABAND BOTH DEFENDANTS

It is further alleged that the crime(s) alleged in count(s) 1-11 involved a large quantity of contraband within the meaning of California Rules of Court Rule 4.421(a)(10).

SPEC ALLEG - INDEPENDENT CRIMES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(1) that the crimes and objectives as alleged in this indictment were predominantly independent of each other.

SPEC ALLEG - DIFFERENT TIMES OR SEPARATE PLACES BOTH DEFENDANTS

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(3) that the crimes were committed at different times and separate places, rather than being committed so closely in time and place as to indicate a single period of aberrant

COUNT 10

On or about June 14, 2024, in the County of Tulare, the crime of POSSESSION OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION 30605(A), a Felony, was committed by THOMAS ALEXANDER BROWNING, who did unlawfully possess an assault weapon, to wit: P80 AR15 Style Rifle.

SPEC ALLEG - USE OF WEAPON

It is further alleged as to count(s) 1-11 that the defendant(s) THOMAS ALEXANDER BROWNING was armed with or used a weapon, to wit AR15 Style Pistol, Franklin Armory AR15 Style Rifle, P80 AR15 Style Rifle, at the time of the commission of the crime within the meaning of California Rules of Court Rule 4.421(a)(2).

SPEC ALLEG - PLANNING, SOPHISTICATION, PROFESSIONALISM

It is further alleged that the manner in which the defendant(s) THOMAS ALEXANDER BROWNING carried out the crime(s) alleged in count(s) 1-11 indicate(s) planning, sophistication, and professionalism within the meaning of California Rules of Court Rule 4.421(a)(8).

SPEC ALLEG - LARGE QUANTITY OF CONTRABAND

It is further alleged that the crime(s) alleged in count(s) 1-11 involved a large quantity of contraband within the meaning of California Rules of Court Rule 4.421(a)(10).

SPEC ALLEG - INDEPENDENT CRIMES

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(1) that the crimes and objectives as alleged in this indictment were predominantly independent of each other.

SPEC ALLEG - DIFFERENT TIMES OR SEPARATE PLACES

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(3) that the crimes were committed at different times and separate places, rather than being committed so closely in time and place as to indicate a single period of aberrant behavior.

COUNT 11

On or about June 14, 2024, in the County of Tulare, the crime of MAINTAINING PLACE FOR SELLING OR USING CONTROLLED SUBSTANCE, in violation of HEALTH AND SAFETY CODE SECTION 11366, a Felony, was committed by THOMAS ALEXANDER BROWNING, who did unlawfully open and maintain a place for the purpose of unlawfully selling, giving away, and using a controlled substance, to wit, cannabis.

SPEC ALLEG - USE OF WEAPON

It is further alleged as to count(s) 1-11 that the defendant(s) THOMAS ALEXANDER BROWNING was armed with or used a weapon, to wit AR15 Style Pistol, Franklin Armory AR15 Style Rifle, P80 AR15 Style Rifle, at the time of the commission of the crime within the meaning of California Rules of Court Rule 4.421(a)(2).

SPEC ALLEG - PLANNING, SOPHISTICATION, PROFESSIONALISM

It is further alleged that the manner in which the defendant(s) THOMAS ALEXANDER BROWNING carried out the crime(s) alleged in count(s) 1-11 indicate(s) planning, sophistication, and professionalism within the meaning of California Rules of Court Rule 4.421(a)(8).

SPEC ALLEG - LARGE QUANTITY OF CONTRABAND

It is further alleged that the crime(s) alleged in count(s) 1-11 involved a large quantity of contraband within the meaning of California Rules of Court Rule 4.421(a)(10).

SPEC ALLEG - INDEPENDENT CRIMES

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(1) that the crimes and objectives as alleged in this indictment were predominantly independent of each other.

SPEC ALLEG - DIFFERENT TIMES OR SEPARATE PLACES

It is further alleged pursuant to California Rules of Court Rule 4.425(a)(3) that the crimes were committed at different times and separate places, rather than being committed so closely in time and place as to indicate a single period of aberrant behavior.

* * * * *

Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

Pursuant to People v. Cunningham, the People hereby put the defendant on notice that the aggravated sentence may be sought in this case.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 5 COUNT(S).

Executed at PORTERVILLE DIVISION, California, on 06/18/2024.

KIRK D DAVIS

DEPUTY DISTRICT ATTORNEY

Agency:

| <u>DEFENDANT NAME</u> | <u>SEX</u> | <u>RACE</u> | <u>HGT</u> | <u>WGT</u> | <u>EYES</u> | <u>HAIR</u> | <u>COURT DATE</u> | <u>INTAKE STATUSES</u> |
|---------------------------|------------|-------------|------------|------------|-------------|-------------|-------------------|------------------------|
| Alisa R Lewis | F | WC | 5'08 | 220 | Brown | Brown | 06/18/24 | IC |
| Domonique Davone Eldridge | M | B | 5'10 | 300 | Black | Brown | 06/18/24 | IC |
| Marquis Deshawn Loring | M | B | 5'06 | 165 | Brown | Black | 06/18/24 | IC |
| Thomas Alexander Browning | M | H | 5'07 | 162 | Brown | Brown | 06/18/24 | IC |

COMPLAINT PROCESSED BY: AC