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**FILED**

**MAY 13 2024**

**EL DORADO CO. SUPERIOR COURT**  
BY AB (DEPUTY)

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF EL DORADO

13 **THE STATE OF CALIFORNIA,**

14 Plaintiff,

15 v.

17 **JESSE VENEGAS** [REDACTED],

18 **NATHAN C. OLIVAS** [REDACTED]

20 **CHRISTOPHER ANDERSON** [REDACTED]

21 Defendants.

Case No. **24 CR1029**

**FELONY COMPLAINT**

Date:

Time:

Dept:

Judge:

Trial Date:

Action Filed:

23 THE ATTORNEY GENERAL OF THE STATE OF CALIFORNIA accuses the above-  
24 named DEFENDANTS of the following criminal offenses:

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1 **COUNT ONE**

2 **CONSPIRACY (PENAL CODE SECTION 182(a)(1))**

3 On or about and between July 9, 2023 to April 2, 2024, in the Counties of El Dorado,  
4 Sacramento, Santa Clara, Monterey, Riverside, Kings, San Benito, Santa Barbara, and Tulare,  
5 DEFENDANTS JESSE VENEGAS, NATHAN C. OLIVAS, and CHRISTOPHER ANDERSON,  
6 did unlawfully commit the crime of CONSPIRACY in violation of Penal Code section 182  
7 subsection (a)(1) in that said Defendants did unlawfully conspire together with each other to  
8 commit the crimes of: UNLAWFUL TAKING OF A VEHICLE, a Felony, in violation of Vehicle  
9 Code section 10851 subsection (a); RECEIVING STOLEN PROPERTY, MOTOR VEHICLE, a  
10 Felony, in violation of Penal Code section 496d subsection (a); OPERATING A CHOP SHOP, a  
11 Felony, in violation of Vehicle Code section 10801; and that pursuant to and for the purpose of  
12 carrying out the objectives and purposes of the aforesaid conspiracy, the said Defendants  
13 committed the following overt acts throughout the alleged time period:

14 Overt Act 1

15 On or about July 9, 2023, defendant VENEGAS sent a message to an unknown user  
16 stating "I'll have you a hellcat by this weekend coming up." A "hellcat" refers to a high  
17 performance vehicle.

18 Overt Act 2

19 On or about July 11, 2023, a co-conspirator messaged defendant VENEGAS "8575  
20 Laguna Grove Drive, Elk Grove, CA 95757". This is the address for Elk Grove Dodge Chrysler  
21 Jeep Ram dealership, in Sacramento County.

22 Overt Act 3

23 On or about July 12, 2023, VENEGAS and an unidentified co-conspirator loitered in the  
24 parking lot of a car dealership located at 8575 Laguna Grove Drive in the city of Elk Grove.  
25 VENEGAS and the co-conspirator were dressed in dark-colored hooded sweatshirts with hoods  
26 over their heads standing near a gray colored Dodge Charger. When approached by police  
27 officers, VENEGAS and the co-conspirator fled. VENEGAS was arrested and found to be in  
28 possession of burglary tools and after-market key fobs.

1           Overt Act 4

2           On or about July 13, 2023, two high-performance Dodge vehicles were reported stolen  
3 from two dealerships in Elk Grove. Surveillance video shows both vehicles parked at a nearby  
4 gas station. VENEGAS was identified by law enforcement as the driver of one of the vehicles.

5           Overt Act 5

6           On or about September 29, 2023, VENEGAS uploaded a video to social media showing  
7 him and another co-conspirator entering an apartment complex in Milpitas, California.  
8 VENEGAS observed a gray SRT Dodge Charger in the parking lot and says to the co-conspirator,  
9 “Let’s take that one.”

10          Overt Act 6

11          On or about October 2, 2023, the owner of the gray SRT Dodge Charger reported the  
12 vehicle stolen. That same day, VENEGAS uploaded a video to social media showing him driving  
13 a gray SRT Dodge Charger with brown upholstery and star-lights installed on the ceiling.

14          Overt Act 7

15          On or about October 10, 2023, a red Dodge Challenger was reported stolen in Morgan  
16 Hill, CA. That same day, VENEGAS uploaded a video of himself driving a red Dodge Challenger  
17 with a shattered window and the rear-view mirror ripped off.

18          Overt Act 8

19          On or about October 10, 2023, the owner of the stolen red Dodge Challenger informed  
20 law enforcement that he had an aftermarket GPS device installed in the vehicle. The GPS showed  
21 that the stolen Challenger was at a residence in Laton, California. Officers contacted the  
22 homeowner (V.L.) who stated his friend “Jesse” (later identified as Jesse VENEGAS) paid him  
23 \$200-300 to store stolen vehicles at his residence. V.L. knew the vehicles were stolen, and stated  
24 he had stored 7-8 vehicles for VENEGAS in the last year.

25          Overt Act 9

26          V.L. stated he communicated with VENEGAS via Snapchat. The Snapchat account  
27 handle for VENEGAS is “venegasjesse559”.

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1           Overt Act 10

2           On or about October 10, 2023, VENEGAS sent a message to an Instagram group chat that  
3 included defendants OLIVAS and ANDERSON. In the message, VENEGAS stated “They took  
4 one of my cars”; “raided the place”; “The red bone”; “nah learned my listen[sic] though only take  
5 from lots”; “All I needed was 2 more hours and I was gone drop it off to buyer”. VENEGAS  
6 further stated “my friend received stolen property that’s it” and “think I’m in the clear”; “I wasn’t  
7 there.”

8           Overt Act 11

9           On or about October 21, 2023, VENEGAS messaged fellow social media users that he  
10 would join the street take over that night in the Bay Area “after I take this car off the lot lmao.”  
11 One of the social media users responded “U heading out right after with a stolie.” VENEGAS  
12 responded “cmon now you know how we do.” Later on VENEGAS sent another group message  
13 stating “just got the car from the lot,” “what’s the spot?”

14           Overt Act 12

15           On or about October 22, 2023, a vehicle dealership in San Jose reported a white Dodge  
16 Challenger SRT 392 was stolen from its car lot. The dealership had surveillance video showing  
17 two individuals run up the vehicle smash the window and drive off with the vehicle.

18           Overt Act 13

19           On or about October 22, 2023, VENEGAS uploaded two videos to social media accounts  
20 showing a white Dodge Challenger SRT 392 with red and black interior, and with red brake  
21 calipers.

22           Overt Act 14

23           On or about October 22, 2023, VENEGAS uploaded a video to his social media account  
24 showing a white Dodge Challenger SRT 392 with red and black interior, being driven recklessly  
25 in a street take-over event in San Jose, California.

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1           Overt Act 15

2           On or about October 22, 2023, VENEGAS posted on social media a white Dodge  
3 Challenger SRT for sale for \$2,500.00 and stated “came from San Jose,” and “have paper plates  
4 ready for it.”

5           Overt Act 16

6           On or about October 28, 2023, VENEGAS messaged ANDERSON on Instagram saying  
7 VENEGAS will pay \$500, plus gas money, to ANDERSON if he drives them to “sac to get a  
8 kitty”. Kitty refers to Dodge Hellcat model vehicles.

9           Overt Act 17

10          On or about November 10, 2023, Volkswagen of Murrieta, a car dealership, reported a  
11 white Dodge Challenger stolen. Surveillance video footage showed two subjects breaking the  
12 driver’s side window and jumping into the car and driving it off the lot.

13          Overt Act 18

14          On or about November 10, 2023, VENEGAS uploaded a video to social media showing  
15 the interior and mileage of a white Dodge Challenger. In the video, VENEGAS is heard saying he  
16 got the vehicle from “Murrieta Volkswagen” and plans to sell it. The video also depicts two other  
17 co-conspirators tampering with the dealership paperwork on the front and back windshields.

18          Overt Act 19

19          On or about November 25, 2023, between 1:33 a.m. and 2:41 a.m., OLIVAS and  
20 VENEGAS traveled to Seaside, California and ended up near Victory Toyota car dealership.  
21 Victory Toyota later reported a black Dodge Challenger had been stolen from their lot at  
22 approximately 2:45 a.m.

23          Overt Act 20

24          On or about November 25, 2023, at approximately 3:13 a.m., VENEGAS uploaded a  
25 video of himself driving a black Dodge Challenger with shattered glass on the inside. In a social  
26 media group message, VENEGAS said he “went to San Jose then Fremont then all the way to  
27 Monterey,” “went to Seaside after sj and Fremont,” and “split my hand open pretty good for the  
28 pos scat.” “Scat” is slang for a particular type of performance Dodge Charger or Challenger.

1           Overt Act 21

2           On or about November 25, 2023, OLIVAS and VENEGAS drove a black Dodge  
3 Challenger, from Seaside, California to Hanford, California and parked it outside VENEGAS'  
4 apartment complex.

5           Overt Act 22

6           On or about November 25, 2023, VENEGAS sent social media messages discussing the  
7 police recovering the stolen black Dodge Challenger: "They picked up the car," "outside my  
8 apts," "they dusted for fingerprints." VENEGAS then uploaded a video of someone driving by  
9 the officers as they recovered the stolen Challenger. Another member of the group chat asked  
10 "was it from a dealer or" and VENEGAS replies "yeah was from sea side Toyota."

11           Overt Act 23

12           On or about November 25, 2023, a co-conspirator uploaded a video to the Instagram  
13 group chat VENEGAS, OLIVAS and ANDERSON were using. In the video, the co-conspirator is  
14 burning paperwork from the Victory Toyota dealership that had belonged to the stolen Dodge  
15 Challenger including a service tag and registration information. The co-conspirator stated "look  
16 what this 'Pee Wee' having me burn right now in my backyard." Defendant Nathan OLIVAS'  
17 nickname is "Pee Wee."

18           Overt Act 24

19           On or about December 1, 2023, OLIVAS sent a screenshot to VENEGAS. The screenshot  
20 depicted an advertisement for a maroon Jeep Grand Cherokee "Track Hawk" for sale in El  
21 Dorado Hills, CA.

22           Overt Act 25

23           On or about December 1, 2023, VENEGAS sent a message to an unidentified user: "if you  
24 know anyone who may want a "trackhawk"; "\$3,500"; "I'm gone get it tonight."

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1           Over Act 26

2           On or about December 2, 2023, VENEGAS and OLIVAS and ANDERSON traveled to El  
3 Dorado Hills, California, in El Dorado County, and arrived near the Mercedes Benz of El Dorado  
4 Hills, a car dealership. At approximately 1:00 a.m. the maroon Jeep Track Hawk was stolen from  
5 Mercedes Benz of El Dorado Hills.

6           Overt Act 27

7           On or about December 2, 2023, at approximately 2:00 a.m., Defendant ANDERSON  
8 uploaded a video on his social media account. In the video, ANDERSON walks up to a maroon  
9 Jeep Grand Cherokee Track Hawk which has a shattered window. As he gets closer,  
10 ANDERSON states “we working right now”. In the video, ANDERSON states the license plate  
11 needs to be covered and attempts to obscure the license plate with his hand.

12           Overt Act 28

13           On or about December 2, 2023, ANDERSON uploaded a still image of himself inside a  
14 vehicle with the caption “Track hawk online rn for the low need it gone.”

15           Overt Act 29

16           On or about December 2, 2023, VENEGAS, ANDERSON, and OLIVAS travel from El  
17 Dorado Hills to Visalia, California and park a maroon Jeep Grand Cherokee Track Hawk around  
18 the corner from ANDERSON’S residence.

19           Overt Act 30

20           On or about December 2, 2023, ANDERSON uploaded a video of himself and OLIVAS  
21 at a gas station in Visalia, CA with a maroon Jeep. In the video, ANDERSON brags about  
22 stealing the Jeep and says “we stole this bitch.” In the same video, an unknown individual  
23 approaches ANDERSON and OLIVAS at the gas station. ANDERSON offers the stolen Jeep for  
24 sale to the unknown individual for \$3,000.00.

25           Overt Act 31

26           On or about December 2, 2023, ANDERSON uploaded a video of himself saying “let me  
27 know, I got it right now” and flips the camera to show a vehicle resembling the shape of a Jeep  
28 underneath a tarp.

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Overt Act 32

On or about December 2, 2023, in an Instagram message thread, VENEGAS mentioned the stolen maroon Jeep: “was overpriced so had to take”; “even though I’m letting it go for 3k”; “30 secs to start the car once everything was plugged in and without hazards”; “I drove it threw[sic] a gate”.

Overt Act 33

On or about December 2, 2023, ANDERSON posted a photo of himself standing on the hood of the stolen Jeep displaying the letter “M” with his right hand. The “M” refers to “Guttahmob” which is a car club believed to be involved in street takeover events, vehicle thefts, drug sales, and illegal firearms trafficking.

Overt Act 34

On or about December 2, 2023, ANDERSON uploaded a video to social media showing him driving a maroon Jeep. ANDERSON states in the video that the Jeep was already sold and that he was “getting cashed out right now.”

Overt Act 35

On or about December 2, 2023, ANDERSON drove the maroon Jeep to Porterville, California where he stated that he sold it for \$4,000.00 to an unknown individual. An Instagram video shows ANDERSON splitting the cash into separate stacks. ANDERSON is heard stating “we got Jesse’s cut”, “we got Sugés cut”, “we got Pee-Wee’s cut”. “Jesse” is referring to defendant VENEGAS and “Pee-Wee” is referring to defendant OLIVAS.

Overt Act 36

On or about December 2, 2023, in a video uploaded to social media, ANDERSON and OLIVAS are seen inside a vehicle counting cash. OLIVAS is heard on the phone with VENEGAS and tells VENEGAS they already dropped off everything and got the payment. OLIVAS also states “they did not want the fake plate.” VENEGAS, OLIVAS, and ANDERSON further discuss each of their “cuts” from the proceeds of selling the stolen Jeep.

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1           Overt Act 37

2           On or about December 2, 2023, in the same video as discussed above, ANDERSON  
3 recorded himself holding cash. In the video he points the camera to OLIVAS sitting in the  
4 passenger seat. OLIVAS is also counting cash. OLIVAS or ANDERSON then state “we just  
5 made 4K,” “a stolen Track-E for 4k,” “we just made 4k in one day.”

6           Overt Act 38

7           On or about December 3, 2023, VENEGAS sends an Instagram message to a group chat  
8 stating he wants to take an orange Dodge Challenger before attending a street takeover event.  
9 VENEGAS followed the message with a screenshot of an advertisement from Capitol Ford in San  
10 Jose depicting the orange Dodge Challenger. Someone in the group chat asked if he was going to  
11 get it “rn” (meaning right now) and VENEGAS replied “Yeah,” “San Jose then I’ll be there.”  
12 Another user stated to not worry about the “trackers” and to leave the vehicle at the takeover  
13 event. VENEGAS replied “exactly on rim” (this refers to destroying the vehicle so there is  
14 nothing left but the wheel rims). The same individual said “fuck it lets catch it on fire in the  
15 middle of the pit towards the end,” “no evidence.” VENEGAS replied “I’m down.”

16           Overt Act 39

17           On or about December 3, 2023, VENEGAS and OLIVAS traveled from VENEGAS’  
18 apartment in Hanford to the Capitol Ford dealership in San Jose, California. Later that day,  
19 Capitol Ford reported an orange Dodge Challenger had been stolen from their dealership.

20           Overt Act 40

21           On or about December 3, 2023, at approximately 3:00 a.m., VENEGAS and OLIVAS  
22 posted a video of themselves driving an orange Dodge Challenger. In the video shattered glass  
23 can be seen on the floorboard. VENEGAS asked in a group chat on social media for the address  
24 of the street takeover, and someone sent a photo stating “International Blvd & 35<sup>th</sup> Ave, Oakland,  
25 CA 94601.”

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1           Overt Act 41

2           On or about December 3, 2023, VENEGAS posted several videos and photos depicting an  
3 orange Dodge Challenger at the street takeover event. One video depicted an unknown individual  
4 standing on top of the orange Challenger holding a “Guttahmob” flag. Another photo showed  
5 OLIVAS in the vehicle making the letter “M” with his right hand.

6           Overt Act 42

7           On or about December 3, 2023, VENEGAS posted a photo on Instagram showing a  
8 burned vehicle in the middle of an intersection. After uploading the photo VENEGAS stated  
9 “was a nice mango color”. In addition, VENEGAS had various conversations referring to the  
10 vehicle: “took it from sj an hour before that”; “I left that bitch out there crashed into a pole on  
11 purpose I was to hyphy”; “I went on rim and crashed into pole and burned it to nothing.”

12           Overt Act 43

13           On or about January 5, 2024, VENEGAS sent an Instagram message to ANDERSON  
14 stating “we go to the bay tonight for a red eye.” The message was followed by several pictures of  
15 a white Dodge Charger for sale at a Dodge dealership located at 17085 Condit Road, Morgan  
16 Hill, California. VENEGAS sent another message saying they are leaving at 7:30.

17           Overt Act 44

18           On or about January 5, 2024, ANDERSON agreed to go with VENEGAS and asked  
19 VENEGAS for gas money.

20           Overt Act 45

21           On or about January 5, 2024, VENEGAS, OLIVAS, and ANDERSON traveled from  
22 Hanford, California to Morgan Hill, California and arrived near the Dodge dealership.

23           Overt Act 46

24           On or about January 6, 2024, the Dodge dealership reported an attempted theft of a white  
25 Dodge Challenger occurred that morning around midnight. The report stated, and a surveillance  
26 video confirmed, that there were three individuals involved who were breaking the window of a  
27 white Dodge Charger. Further, the report identified a white 4-door sedan parked across a field  
28 near the dealership.

1           Overt Act 47

2           On or about January 6, 2024, Morgan Hill police officers responded to the dealership.  
3           After responding, officers conducted a traffic stop on ANDERSON, who was driving a white  
4           Mazda 4-door sedan that matched the description of the getaway vehicle. The vehicle was  
5           registered to ANDERSON.

6           Overt Act 48

7           On or about January 6, 2024, VENEGAS sent a message on the Instagram group chat  
8           referring to the attempted theft of the white Dodge Charger. VENEGAS said he was “hiding from  
9           chp last night for 4 hours in a bush.” One user asked why and VENEGAS replied “Chp pulled up  
10          on us at a lot we had to run across the 101.” During this conversation VENEGAS sent a video  
11          showing a ripped sweater with the caption “done got stuck on 3 bob wire fences.” VENEGAS  
12          then sent a screenshot of an advertisement for the white Dodge Charger located at the dealership.  
13          VENEGAS then stated “I legit almost had it programmed”; “the camera on the lot got the car  
14          going in there twice scoping out the lot they pulled Chris over let him go but they was looking for  
15          me and peewee for 4 hours.” Further, VENEGAS sent a screenshot of the Maps application on his  
16          phone with a “dropped pin” in the area of Walnut Grove and Diana Ave in the City of Morgan  
17          Hills, California. This location is across from the Dodge dealership. VENEGAS stated “ran bout a  
18          mile (laughing emojis).”

19          Overt Act 49

20          On or about January 9, 2024, at approximately 11:34 p.m., OLIVAS and VENEGAS are  
21          located approximately .15 miles away from the location a gray Dodge Challenger was reported  
22          stolen, which was near Armona Road and Robin Court in Hanford, California. Shortly after this,  
23          OLIVAS and VENEGAS traveled to Visalia, California.

24          Overt Act 50

25          On or about January 10, 2024, a gray Dodge Challenger was reported stolen in Hanford,  
26          California, and VENEGAS posted a photo on Snapchat showing the stolen gray Dodge  
27          Challenger parked at a gas station.

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1           Overt Act 51

2           On or about January 10, 2024, OLIVAS posted a video on Snapchat. The video begins by  
3 showing a “XTOOL” key programming device on the front passenger seat of a vehicle. OLIVAS  
4 points the camera out the driver’s window showing a gray Dodge Challenger parked on the street  
5 partially covered by a tarp.

6           Overt Act 52

7           On or about January 10, 2024, OLIVAS posted a video to Instagram showing the back of  
8 a white 2017 Dodge Charger with license plate 9CRT545 with the caption “Good chally  
9 (laughing emoji)”. “Chally” is slang for Dodge Challenger.

10          Overt Act 53

11          On or about February 4, 2024, a 2017 white Dodge Charger with license plate 9CRT545  
12 was reported stolen from Hollister, California and around that time VENEGAS posted to  
13 Instagram a video of the exterior and interior of a white Dodge Charger, with red and black  
14 interior seats and shattered glass on the seats.

15          Overt Act 54

16          On or about February 4, 2024, OLIVAS posted a video of the stolen 2017 white Dodge  
17 Charger which showed the partial plate of the vehicle and matching red and black upholstery to  
18 the stolen Charger.

19          Overt Act 55

20          On or about February 25, 2024, VENEGAS posted a picture on Instagram showing  
21 ANDERSON standing next to a white Dodge Charger. A white Dodge Charger was reported  
22 stolen on February 25, 2024. VENEGAS put a message under the image stating, “I have a scat  
23 for sale,” “Good 4 door lmk if anyone also interested in this mofo.”

24          Overt Act 56

25          On or about February 26, 2024, VENEGAS posted another picture with a white Dodge  
26 Charger and followed the post with “I sold her 2 am type deal”, “\$3500 for the whole thing.”

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1           Overt Act 57

2           On or about February 26, 2024, VENEGAS sent a picture to the Instagram group chat.  
3           The picture is a screenshot of a Facebook post discussing a stolen white Dodge Charger out of  
4           Lemoore, California, asking for information on the vehicle from the community. ANDERSON  
5           replied to VENEGAS “lol wonder who.”

6           Overt Act 58

7           On or about March 8, 2024, OLIVAS and VENEGAS were detained by Visalia Police  
8           Department in a Silver Honda driven by OLIVAS. Upon conducting a search of the vehicle,  
9           officers observed an “XTOOL” key programming device, a license plate with the word  
10          “guttahmob” and a Dodge vehicle manual.

11          Overt Act 59

12          On or about March 8, 2024, after OLIVAS and VENEGAS were released law  
13          enforcement recovered a stolen white Dodge Charger several feet away from where they had  
14          detained OLIVAS and VENEGAS. During the detention, VENEGAS messaged in a group chat  
15          on social media “(Laughing emoji) (laughing emoji) they was 10 feet away from the scat.”  
16          OLIVAS then replied “the striker was like 5 feet away”.

17          Overt Act 60

18          On or about February 28, 2024, an unidentified Instagram user messaged VENEGAS and  
19          asked for a “4door cat.” VENEGAS responded with a screenshot of a website advertisement for a  
20          2015 blue Dodge Challenger Hellcat located at a dealership in Santa Maria, California.  
21          VENEGAS further messaged “this what’s on the menu,” “Ina few days ima try.”

22          Overt Act 61

23          On or about March 4, 2024, VENEGAS sent a screenshot of the 2015 blue Dodge  
24          Challenger Hellcat to the Instagram group chat that includes ANDERSON and OLIVAS. After  
25          sending the photo, VENEGAS messaged “I need this” and also stated that whoever goes with him  
26          he will pay them money. ANDERSON asked how much VENEGAS will pay upfront and  
27          VENEGAS replied “\$400 if we get the car home.”

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Overt Act 62

On or about March 23, 2024, the 2015 blue Dodge Challenger Hellcat was stolen from Santa Maria, California, and on that day VENEGAS traveled to Santa Maria, California.

Overt Act 63

On or about March 23, 2024, VENEGAS posted on social media a video of himself driving a 2015 blue Dodge Challenger Hellcat, doing donuts in the middle of an intersection, and a photo of the vehicle at a gas station.

Overt Act 64

On or about March 26, 2024, OLIVAS posted a video on Instagram showing him and VENEGAS taking apart a 2015 stolen blue Dodge Challenger Hellcat. VENEGAS also posted videos to social media showing VENEGAS, OLIVAS and ANDERSON taking apart the vehicle. VENEGAS posted a photo of blue doors, fender, hood, and other vehicle parts in the back of a U-Haul.

Overt Act 65

Law enforcement recovered what was left of the 2015 blue Dodge Challenger Hellcat which had been altered by removal of the interior, engine, hood, steering wheel, seats, and doors. The vehicle was located in the backyard of OLIVAS' grandparents' house. OLIVAS' grandparent confirmed OLIVAS and his "friends" come and go in the backyard as they please.

**COUNT 2**

**VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

For a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Count 1, complainant further complains and says: On or about July 12, 2023, in the County of Sacramento, the crime of UNLAWFUL TAKING OF A VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony, was committed by JESSE VENEGAS, who did unlawfully take a vehicle exceeding nine hundred and fifty dollars (\$950) to wit: Black 2016 Dodge Challenger with an orange stripe, valued at approximately \$50,000.00, then and there the personal property of ELK GROVE DODGE, a

1 dealership, without the consent of and with intent, either permanently or temporarily, to deprive  
2 the said owner of title to and possession of said vehicle.

3 **COUNT 3**

4 **VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

5 For a further and separate cause of action, being a different offense from but connected in  
6 its commission with the crime set forth in Counts 1-2, complainant further complains and says:  
7 On or about October 2, 2023, in the County of Santa Clara, the crime of UNLAWFUL TAKING  
8 OF A VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony, was  
9 committed by JESSE VENEGAS, who did unlawfully take a vehicle exceeding nine hundred and  
10 fifty dollars (\$950) to wit: Gray 2016 Dodge Challenger, license plate number 7WQN342, valued  
11 at approximately \$30,000.00, then and there the personal property of John I.C. Doe, without the  
12 consent of and with intent, either permanently or temporarily, to deprive the said owner of title to  
13 and possession of said vehicle.

14 **COUNT 4**

15 **RECEIVING STOLEN PROPERTY (PENAL CODE SECTION 496D(A))**

16 For a further and separate cause of action, being a different offense from but connected in  
17 its commission with the crime set forth in Counts 1-3, complainant further complains and says:  
18 On or about October 2, 2023, in the County of Santa Clara, the crime of RECEIVING STOLEN  
19 PROPERTY, MOTOR VEHICLE in violation of Penal Code section 496d subsection (a), a  
20 Felony, was committed by JESSE VENEGAS, who at the time and place last aforesaid, did  
21 unlawfully buy or receive a vehicle exceeding nine hundred and fifty dollars (\$950) to wit: Gray  
22 2016 Dodge Challenger, license plate number 7WQN342, then and there the personal property of  
23 John I.C. Doe that was stolen and had been obtained in a manner constituting theft or extortion,  
24 knowing the property to be stolen and obtained, and did conceal, sell, withhold, or aid in  
25 concealing, selling and withholding said property.

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**COUNT 5**

**VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

For a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts 1-4, complainant further complains and says: On or about October 10, 2023, in the County of Santa Clara, the crime of UNLAWFUL TAKING OF A VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony, was committed by JESSE VENEGAS, who did unlawfully take a vehicle exceeding nine hundred and fifty dollars (\$950) to wit: Red 2016 Dodge Challenger, license plate number SJC6218, valued at approximately \$75,000.00, then and there the personal property of John C.H. Doe without the consent of and with intent, either permanently or temporarily, to deprive the said owner of title to and possession of said vehicle.

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**COUNT 6**

**VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

For a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts 1-5, complainant further complains and says: On or about October 22, 2023, in the County of Santa Clara, the crime of UNLAWFUL TAKING OF A VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony, was committed by JESSE VENEGAS, who did unlawfully take a vehicle exceeding nine hundred and fifty dollars (\$950) to wit: White 2016 Dodge Challenger, license plate number 9DWM702, valued at approximately \$40,000.00, then and there the personal property of Stevens Creek Showcase, a dealership, without the consent of and with intent, either permanently or temporarily, to deprive the said owner of title to and possession of said vehicle.

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**COUNT 7**

**VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

For a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts 1-6, complainant further complains and says: On or about November 10, 2023, in the County of Riverside, the crime of UNLAWFUL TAKING OF A VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony,



1 was committed by JESSE VENEGAS, who did unlawfully take a vehicle exceeding nine hundred  
2 and fifty dollars (\$950) to wit: White 2015 Dodge Challenger, license plate number 8BIY245,  
3 valued at approximately \$50,000.00, then and there the personal property of Volkswagen  
4 Dealership of Murrieta, a dealership, without the consent of and with intent, either permanently or  
5 temporarily, to deprive the said owner of title to and possession of said vehicle.

6 **COUNT 8**

7 **RECEIVING STOLEN PROPERTY (PENAL CODE SECTION 496D(A))**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission with the crime set forth in Counts 1-7, complainant further complains and says:

10 On or about November 10, 2023, in the County of Riverside, the crime of RECEIVING  
11 STOLEN PROPERTY, MOTOR VEHICLE in violation of Penal Code section 496d subsection  
12 (a), a Felony, was committed by JESSE VENEGAS, who at the time and place last aforesaid, did  
13 unlawfully buy or receive a vehicle exceeding nine hundred and fifty dollars (\$950) to wit: White  
14 2015 Dodge Challenger, license plate number 8BIY245, valued at approximately \$50,000.00,  
15 then and there the personal property of Volkswagen Dealership of Murrieta, a dealership, that was  
16 stolen and had been obtained in a manner constituting theft or extortion, knowing the property to  
17 be stolen and obtained, and did conceal, sell, withhold, or aid in concealing, selling and  
18 withholding said property.

19 **COUNT 9**

20 **VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

21 For a further and separate cause of action, being a different offense from but connected in  
22 its commission with the crime set forth in Counts 1-8, complainant further complains and says:

23 On or about November 25, 2023, in the County of Monterey, the crime of UNLAWFUL  
24 TAKING OF A VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony,  
25 was committed by JESSE VENEGAS and NATHAN C. OLIVAS, who did unlawfully take a  
26 vehicle exceeding nine hundred and fifty dollars (\$950) to wit: Black 2016 Dodge Challenger,  
27 license plate number 7SOC388, valued at approximately \$30,000.00, then and there the personal  
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1 property of Victory Toyota, without the consent of and with intent, either permanently or  
2 temporarily, to deprive the said owner of title to and possession of said vehicle.

3 **COUNT 10**

4 **RECEIVING STOLEN PROPERTY (PENAL CODE SECTION 496D(A))**

5 For a further and separate cause of action, being a different offense from but connected in  
6 its commission with the crime set forth in Counts 1-9, complainant further complains and says:  
7 On or about November 25, 2023, in the County of Monterey, the crime of RECEIVING STOLEN  
8 PROPERTY, MOTOR VEHICLE in violation of Penal Code section 496d subsection (a), a  
9 Felony, was committed by JESSE VENEGAS and NATHAN C. OLIVAS, who at the time and  
10 place last aforesaid, did unlawfully buy or receive a vehicle exceeding nine hundred and fifty  
11 dollars (\$950) to wit: Black 2016 Dodge Challenger, license plate number 7SOC388, valued at  
12 approximately \$30,000.00, then and there the personal property of Victory Toyota, that was  
13 stolen and had been obtained in a manner constituting theft or extortion, knowing the property to  
14 be stolen and obtained, and did conceal, sell, withhold, or aid in concealing, selling and  
15 withholding said property.

16 **COUNT 11**

17 **VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

18 For a further and separate cause of action, being a different offense from but connected in  
19 its commission with the crime set forth in Counts 1-10, complainant further complains and says:  
20 On or about December 2, 2023, in the County of El Dorado, the crime of UNLAWFUL TAKING  
21 OF A VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony, was  
22 committed by JESSE VENEGAS, NATHAN C. OLIVAS, and CHRISTOPHER ANDERSON,  
23 who did unlawfully take a vehicle exceeding nine hundred and fifty dollars (\$950) to wit: 2018  
24 Jeep Grand Cherokee Track Hawk, license plate number 8HNU433, valued at approximately  
25 \$75,000.00, then and there the personal property of Mercedes of El Dorado Hills, without the  
26 consent of and with intent, either permanently or temporarily, to deprive the said owner of title to  
27 and possession of said vehicle.

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**COUNT 12**

**RECEIVING STOLEN PROPERTY (PENAL CODE SECTION 496D(A))**

For a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts 1-11, complainant further complains and says: On or about December 2, 2023, in the County of El Dorado, the crime of RECEIVING STOLEN PROPERTY, MOTOR VEHICLE in violation of Penal Code section 496d subsection (a), a Felony, was committed by JESSE VENEGAS, NATHAN C. OLIVAS, and CHRISTOPHER ANDERSON, who at the time and place last aforesaid, did unlawfully buy or receive a vehicle exceeding nine hundred and fifty dollars (\$950) to wit: 2018 Jeep Grand Cherokee Track Hawk, license plate number 8HNU433, valued at approximately \$75,000.00, then and there the personal property of Mercedes of El Dorado Hills, that was stolen and had been obtained in a manner constituting theft or extortion, knowing the property to be stolen and obtained, and did conceal, sell, withhold, or aid in concealing, selling and withholding said property.

**COUNT 13**

**VANDALISM (PENAL CODE SECTION 594(A)(2))**

For a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts 1-12, complainant further complains and says: On or about December 2, 2023, in the County of El Dorado, the crime of VANDALISM OVER \$400 DAMAGE in violation of Penal Code section 594 subsection (a)(2), a Felony, was committed by JESSE VENEGAS, NATHAN C. OLIVAS, and CHRISTOPHER ANDERSON, who did unlawfully and maliciously damage or destroy real and personal property, to wit: A GATE not his own, then and there the personal property of MERCEDES OF EL DORADO, the amount of said damage being over \$400.00.

**COUNT 14**

**VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

For a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts 1-13, complainant further complains and says: On or about December 3, 2023, in the County of Santa Clara, the crime of UNLAWFUL

1 TAKING OF A VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony,  
2 was committed by JESSE VENEGAS and NATHAN C. OLIVAS who did unlawfully take a  
3 vehicle exceeding nine hundred and fifty dollars (\$950) to wit: Orange 2016 Dodge Challenger,  
4 license plate number BODAXU, valued at approximately \$25,000.00, then and there the personal  
5 property of San Jose Capital Ford, without the consent of and with intent, either permanently or  
6 temporarily, to deprive the said owner of title to and possession of said vehicle.

7 **COUNT 15**

8 **RECEIVING STOLEN PROPERTY (PENAL CODE SECTION 496D(A))**

9 For a further and separate cause of action, being a different offense from but connected in  
10 its commission with the crime set forth in Counts 1-14, complainant further complains and says:  
11 On or about December 3, 2023, in the County of Santa Clara, the crime of RECEIVING  
12 STOLEN PROPERTY, MOTOR VEHICLE in violation of Penal Code section 496d(a), a Felony,  
13 was committed by JESSE VENEGAS and NATHAN C. OLIVAS who at the time and place last  
14 aforesaid, did unlawfully buy or receive a vehicle exceeding nine hundred and fifty dollars (\$950)  
15 to wit: Orange 2016 Dodge Challenger, license plate number BODAXU, valued at approximately  
16 \$25,000.00, then and there the personal property of San Jose Capital Ford, that was stolen and  
17 had been obtained in a manner constituting theft or extortion, knowing the property to be stolen  
18 and obtained, and did conceal, sell, withhold, or aid in concealing, selling and withholding said  
19 property.

20 **COUNT 16**

21 **ARSON (PENAL CODE SECTION 451(D))**

22 For a further and separate cause of action, being a different offense from but connected in  
23 its commission with the crime set forth in Counts 1-15, complainant further complains and says:  
24 On or about December 3, 2023, in the County of Santa Clara, the crime of the crime of ARSON  
25 OF PROPERTY OF ANOTHER, a Felony, in violation of Penal Code 451 subsection (d), was  
26 committed by JESSE VENEGAS and NATHAN C. OLIVAS, who did willfully, unlawfully, or  
27 maliciously set fire to, or burn or cause to be burned or aid in the setting fire to, or burning, or  
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1 causing to be burned, the property of another, to wit: Orange 2016 Dodge Challenger, license  
2 plate number BODAXU, then and there the personal property of San Jose Capital Ford.

3 NOTICE: The above-offense is a serious felony within the meaning of Penal Code section  
4 1192.7 subsection (c).

5 **COUNT 17**

6 **ATTEMPTED VEHICLE THEFT (PENAL CODE SECTION 664 & VEHICLE CODE**  
7 **SECTION 10851(A))**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission with the crime set forth in Counts 1-16, complainant further complains and says:  
10 On or about January 6, 2024, in the County of Santa Clara, the crime of ATTEMPTED  
11 UNLAWFUL TAKING OF A VEHICLE in violation of Penal Code section 664 and Vehicle  
12 Code section 10851 subsection (a), a Felony, was committed by JESSE VENEGAS, NATHAN  
13 C. OLIVAS, and CHRISTOPHER ANDERSON who did unlawfully attempt to take a vehicle  
14 exceeding nine hundred and fifty dollars (\$950) to wit: White 2020 Dodge Charger Hellcat SRT  
15 license plate number 8TLC551, valued at approximately \$60,000.00, then and there the personal  
16 property of Chrystler Dodge Jeep Ram in Morgan Hill, without the consent of and with intent,  
17 either permanently or temporarily, to deprive the said owner of title to and possession of said  
18 vehicle.

19 **COUNT 18**

20 **VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

21 For a further and separate cause of action, being a different offense from but connected in  
22 its commission with the crime set forth in Counts 1-17, complainant further complains and says:  
23 On or about January 9, 2024, in the County of Kings, the crime of UNLAWFUL TAKING OF A  
24 VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony, was committed  
25 by JESSE VENEGAS and NATHAN C. OLIVAS who did unlawfully take a vehicle exceeding  
26 nine hundred and fifty dollars (\$950), to wit: Gray 2017 Dodge Challenger license plate number  
27 8HDC773 valued at approximately \$20,000.00, then and there the personal property of John L.F.  
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1 Doe, without the consent of and with intent, either permanently or temporarily, to deprive the said  
2 owner of title to and possession of said vehicle.

3 **COUNT 19**

4 **RECEIVING STOLEN PROPERTY (PENAL CODE SECTION 496D(A))**

5 For a further and separate cause of action, being a different offense from but connected in  
6 its commission with the crime set forth in Counts 1-18, complainant further complains and says:  
7 On or about January 9, 2024, in the County of Kings, the crime of RECEIVING STOLEN  
8 PROPERTY, MOTOR VEHICLE in violation of Penal Code section 496d subsection (a), a  
9 Felony, was committed by JESSE VENEGAS and NATHAN C. OLIVAS who at the time and  
10 place last aforesaid, did unlawfully buy or receive a vehicle exceeding nine hundred and fifty  
11 dollars (\$950), to wit: Gray 2017 Dodge Challenger license plate number 8HDC773 valued at  
12 approximately \$20,000.00, then and there the personal property of John L.F. Doe, that was stolen  
13 and had been obtained in a manner constituting theft and extortion, knowing the property to be  
14 stolen and obtained, and did conceal, sell, withhold, and aid in concealing, selling and  
15 withholding said property.

16 **COUNT 20**

17 **VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

18 For a further and separate cause of action, being a different offense from but connected in  
19 its commission with the crime set forth in Counts 1-19, complainant further complains and says:  
20 On or about February 4, 2024, in the County of San Benito, the crime of UNLAWFUL TAKING  
21 OF A VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony, was  
22 committed by JESSE VENEGAS and NATHAN C. OLIVAS who did unlawfully take a vehicle  
23 exceeding nine hundred and fifty dollars (\$950), to wit: White 2017 Dodge Challenger license  
24 plate number 9CRT545, valued at approximately \$30,000.00, then and there the personal property  
25 of John E.B. Doe, without the consent of and with intent, either permanently or temporarily, to  
26 deprive the said owner of title to and possession of said vehicle.

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**COUNT 21**

**RECEIVING STOLEN PROPERTY (PENAL CODE SECTION 496D(A))**

For a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts 1-20, complainant further complains and says: On or about February 4, 2024, in the County of San Benito, the crime of RECEIVING STOLEN PROPERTY, MOTOR VEHICLE in violation of Penal Code section 496d subsection (a), a Felony, was committed by JESSE VENEGAS and NATHAN C. OLIVAS who at the time and place last aforesaid, did unlawfully buy or receive a vehicle exceeding nine hundred and fifty dollars (\$950), to wit: White 2017 Dodge Challenger license plate number 9CRT545, valued at approximately \$30,000.00, then and there the personal property of John E.B. Doe, that was stolen and had been obtained in a manner constituting theft or extortion, knowing the property to be stolen and obtained, and did conceal, sell, withhold, or aid in concealing, selling and withholding said property.

**COUNT 22**

**VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

For a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts 1-21, complainant further complains and says: On or about February 25, 2024, in the County of Kings, the crime of UNLAWFUL TAKING OF A VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony, was committed by JESSE VENEGAS, NATHAN C. OLIVAS, and CHRISTOPHER ANDERSON, who did unlawfully take a vehicle exceeding nine hundred and fifty dollars (\$950) to wit: 2015 Dodge Charger, license plate number 8CKA417, valued at approximately \$55,000.00, then and there the personal property of Jane P.C. Doe, without the consent of and with intent, either permanently or temporarily, to deprive the said owner of title to and possession of said vehicle.

**COUNT 23**

**RECEIVING STOLEN PROPERTY (PENAL CODE SECTION 496D(A))**

For a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts 1-22, complainant further complains and says:

1 On or about February 25, 2024, in the County of Kings, the crime of RECEIVING STOLEN  
2 PROPERTY, MOTOR VEHICLE in violation of Penal Code section 496d subsection (a), a  
3 Felony, was committed by JESSE VENEGAS, NATHAN C. OLIVAS, and CHRISTOPHER  
4 ANDERSON, who at the time and place last aforesaid, did unlawfully buy or receive a vehicle  
5 exceeding nine hundred and fifty dollars (\$950) to wit: 2015 Dodge Charger, license plate  
6 number 8CKA417, valued at approximately \$55,000.00, then and there the personal property of  
7 Jane P.C. Doe, that was stolen and had been obtained in a manner constituting theft or extortion,  
8 knowing the property to be stolen and obtained, and did conceal, sell, withhold, or aid in  
9 concealing, selling and withholding said property.

10 **COUNT 24**

11 **VEHICLE THEFT (VEHICLE CODE SECTION 10851(A))**

12 For a further and separate cause of action, being a different offense from but connected in  
13 its commission with the crime set forth in Counts 1-23, complainant further complains and says:  
14 On or about March 23, 2024, in the County of Santa Barbara, the crime of UNLAWFUL  
15 TAKING OF A VEHICLE in violation of Vehicle Code section 10851 subsection (a), a Felony,  
16 was committed by JESSE VENEGAS, NATHAN C. OLIVAS, and CHRISTOPHER  
17 ANDERSON, who did unlawfully take a vehicle exceeding nine hundred and fifty dollars (\$950)  
18 to wit: 2015 blue Dodge Challenger Hellcat, license plate number 7RAV984, valued at  
19 approximately \$49,000.00, then and there the personal property of Home Motors, a dealership,  
20 without the consent of and with intent, either permanently or temporarily, to deprive the said  
21 owner of title to and possession of said vehicle.

22 **COUNT 25**

23 **RECEIVING STOLEN PROPERTY (PENAL CODE SECTION 496D(A))**

24 For a further and separate cause of action, being a different offense from but connected in  
25 its commission with the crime set forth in Counts 1-24, complainant further complains and says:  
26 On or about March 23, 2024, in the County of Santa Barbara, the crime of RECEIVING  
27 STOLEN PROPERTY, MOTOR VEHICLE in violation of Penal Code section 496d subsection  
28 (a), a Felony, was committed by JESSE VENEGAS, NATHAN C. OLIVAS, and



1 CHRISTOPHER ANDERSON, who at the time and place last aforesaid, did unlawfully buy or  
2 receive a vehicle exceeding nine hundred and fifty dollars (\$950) to wit: 2015 blue Dodge  
3 Challenger Hellcat, license plate number 7RAV984, valued at approximately \$49,000.00, then  
4 and there the personal property of Home Motors, a dealership, that was stolen and had been  
5 obtained in a manner constituting theft or extortion, knowing the property to be stolen and  
6 obtained, and did conceal, sell, withhold, or aid in concealing, selling and withholding said  
7 property.

8 **COUNT 26**

9 **OPERATING A CHOP SHOP (VEHICLE CODE SECTION 10801)**

10 For a further and separate cause of action, being a different offense from but connected in  
11 its commission with the crime set forth in Counts 1-25, complainant further complains and says:  
12 On or about March 23, 2024 through April 2, 2024, in the County of Tulare, the crime of  
13 OPERATING A CHOP SHOP in violation of Vehicle Code section 10801, a Felony, was  
14 committed by JESSE VENEGAS, NATHAN C. OLIVAS, and CHRISTOPHER ANDERSON,  
15 who at the time and place last aforesaid, did unlawfully operate a chop shop with the intent and  
16 knowledge that defendant(s) was in possession of a motor vehicle obtained by theft, and did  
17 intend to alter, destroy, take apart, reassemble or store a motor vehicle or motor vehicle parts with  
18 the purpose of selling or disposing of the motor vehicle or parts or to alter, deface, destroy,  
19 disguise, in order to misrepresent the identity of the motor vehicle.

20 **VENUE**

21 These charges are brought in El Dorado County pursuant to Penal Code sections  
22 786.5, 781, and 786, in that the multiple offenses of theft involve the same defendants and  
23 substantially similar activity in each affected county as part of Defendants' coordinated criminal  
24 scheme. Jurisdiction also extends to all associated offenses connected together in their  
25 commission to the underlying theft offenses.

26 **STATUS ALLEGATION**

27 MANDATORY STATE PRISON INCARCERATION: The said defendants JESSE VENEGAS,  
28 AND NATHAN C. OLIVAS, are hereby notified as to Count 16, that the above offense is a

1 serious felony within the meaning of Penal Code section 1192.7 subsection (c), and that pursuant  
2 to Penal Code sections 1170 subsection (h)(3) and 1170 subsection (f), an executed sentence for  
3 the offense herein charged against said defendant shall be served in the state prison.

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5 NOTE: Conviction of this offense, as to Count 16, will require the said defendants, JESSE  
6 VENEGAS AND NATHAN C. OLIVAS, to provide specimens and samples pursuant to Penal  
7 Code section 296. Willful refusal to provide the specimens and samples is a crime.

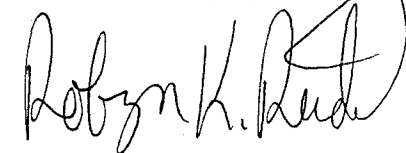
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9 NOTE: As to Counts 1 - 26, committed by the said defendants, JESSE VENEGAS, NATHAN C.  
10 OLIVAS AND CHRISTOPHER ANDERSON, it is further alleged, pursuant to California Rules  
11 of Court 4.421(a)(8), that the manner in which the crimes were carried out indicate planning  
12 sophistication, or professionalism.

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14 NOTE: As to Counts 1 - 26, committed by the said defendants, JESSE VENEGAS, NATHAN C.  
15 OLIVAS AND CHRISTOPHER ANDERSON, it is further alleged, pursuant to California Rules  
16 of Court 4.421(a)(9), that the crimes involved an attempted or actual taking or damage of great  
17 monetary value.

18 Dated: May 13, 2024

Respectfully submitted,

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ROB BONTA  
Attorney General of California  
BRETT J. MORRIS  
Supervising Deputy Attorney General



ROBYN K. RIEDEL  
Deputy Attorney General  
*Attorneys for the People*