

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
CENTRAL**

FILED
Clerk of the Superior Court

MAY 23 2024

By: R. Ignacio
Central Division

THE PEOPLE OF THE STATE OF CALIFORNIA, v. RODNEY ALLEN FLYNT, SR., <i>DOB 08/12/1992;</i> MICHAEL ANTHONY JONES, JR., <i>DOB 10/06/1991;</i> CHRISTOPHER SHAWN PATE, <i>DOB 12/09/1996;</i> RYAN KEITH PATE <i>DOB 12/04/1992;</i>	Plaintiff, Defendant(s)
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CT No. **CD303567 01**

COMPLAINT-FELONY

INFORMATION

Date: _____

PC 296 DNA TEST STATUS SUMMARY

Defendant(s)	DNA Testing Requirements
FLYNT, RODNEY ALLEN, SR. JONES, MICHAEL ANTHONY, JR. PATE, CHRISTOPHER SHAWN PATE, RYAN KEITH	DNA sample required upon conviction DNA sample required upon conviction DNA sample required upon conviction DNA sample required upon conviction

CHARGE SUMMARY

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
1	PC 490.4(a)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE RYAN KEITH PATE				
2	PC 182(a)(1)	Felony	2-3-5		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE				
3	PC 182(a)(1)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR.				

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
					MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE RYAN KEITH PATE
4	PC 487(a)	Felony	16-2-3		RODNEY ALLEN FLYNT SR MICHAEL ANTHONY JONES, JR.
5	PC 487(a)	Felony	16-2-3		RODNEY ALLEN FLYNT SR MICHAEL ANTHONY JONES, JR.
6	PC 487(a)	Felony	16-2-3		MICHAEL ANTHONY JONES, JR.
7	PC 487(a)	Felony	16-2-3		MICHAEL ANTHONY JONES, JR.
8	PC 487(a)	Felony	16-2-3		RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR.
9	PC 459	Felony	16-2-3		RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR.
10	PC 487(a)	Felony	16-2-3		MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE
11	PC 211	Felony	2-3-5		MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
12	PC 487(a)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE				
13	PC 487(a)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE				
14	PC 487(a)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE				
15	PC 459	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE				
16	PC 594(b)(1)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE				
17	PC 487(a)	Felony	16-2-3		
	RODNEY ALLEN FLYNT SR CHRISTOPHER SHAWN PATE				
18	PC 211	Felony	2-3-5		
	RODNEY ALLEN FLYNT SR CHRISTOPHER SHAWN PATE				
19	PC 594(b)(1)	Felony	16-2-3		
	RODNEY ALLEN FLYNT SR CHRISTOPHER SHAWN PATE				

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
20	PC 487(a)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE				
21	PC 459	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE				
22	PC 487(a)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR.				
23	PC 487(a)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE RYAN KEITH PATE				
24	PC 459	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE RYAN KEITH PATE				
25	PC 487(a)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR. CHRISTOPHER SHAWN PATE RYAN KEITH PATE				
26	PC 459	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR. MICHAEL ANTHONY JONES, JR.				

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
	CHRISTOPHER SHAWN PATE				
	RYAN KEITH PATE				
27	PC 487(a)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR.				
	MICHAEL ANTHONY JONES, JR.				
	CHRISTOPHER SHAWN PATE				
	RYAN KEITH PATE				
28	PC 459	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR.				
	MICHAEL ANTHONY JONES, JR.				
	CHRISTOPHER SHAWN PATE				
	RYAN KEITH PATE				
29	PC 487(a)	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR.				
	MICHAEL ANTHONY JONES, JR.				
	CHRISTOPHER SHAWN PATE				
	RYAN KEITH PATE				
30	PC 459	Felony	16-2-3		
	RODNEY ALLEN FLYNT, SR.				
	MICHAEL ANTHONY JONES, JR.				
	CHRISTOPHER SHAWN PATE				
	RYAN KEITH PATE				
	CRC 4.421 CIRCUMSTANCES IN AGGRAVATION				
	PC 186.11(a)(2) AGGRAVATED WHITE COLLAR CRIME-LOSS > \$500,000		2-3-5		
	PC 667(b) thru (i) and PC 1170.12 "THREE STRIKES LAW				
	PC 1054.3 INFORMAL REQUEST FOR DISCOVERY				

The undersigned, certifying upon information and belief, complains that in the Counties of San Diego, Orange, Riverside, State of California, the Defendant(s) did commit the following crime(s):

CHARGES

COUNT 1 - ORGANIZED RETAIL THEFT

On or between April 4, 2023, and May 8, 2024, in the counties of San Diego, Orange, and Riverside, the crime of ORGANIZED RETAIL THEFT, a violation of PENAL CODE SECTION 490.4(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE who did unlawfully act in concert with one or more persons to steal merchandise from one or more merchants' premises with the intent to sell, exchange, or return the merchandise for value, in which the violations are committed on two or more separate occasions within a twelve month period, in which the aggregate value of the merchandise stolen, received, purchased or possessed, is in excess of Nine Hundred and Fifty Dollars (\$950), to wit: Banter By Piercing Pagoda, Kay Jewelers, Zales Jewelry, Princess Jewelers, Marc Jacobs, and JC Penney's.

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

COUNT 2 - CONSPIRACY

On or between April 4, 2023, and May 8, 2024, in the counties of San Diego, in the County of San Diego, the crime of CONSPIRACY TO COMMIT A CRIME, a violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR. and CHRISTOPHER SHAWN PATE who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of SECOND DEGREE ROBBERY, in violation of Section 211 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants RODNEY ALLEN FLYNT, SR. and CHRISTOPHER SHAWN PATE committed the following overt act and acts at and in the County of San Diego:

1.

On or about August 24, 2023, MICHAEL ANTHONY JONES, JR. entered Princess Jewelry located at 1060 E. Main Street in El Cajon, California.

2.

On or about August 24, 2023, CHRISTOPHER SHAWN PATE entered Princess Jewelry located at 1060 E. Main Street in El Cajon, California.

3.

On or about December 13, 2023, RODNEY ALLEN FLYNT, SR. entered Banter by Piercing Pagoda located at 200 East Via Rancho Parkway in Escondido, California.

COUNT 3 - CONSPIRACY

On or between April 4, 2023, and May 8, 2024, in the counties of San Diego, the crime of CONSPIRACY TO COMMIT A CRIME, a violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of SECOND DEGREE COMMERCIAL BURGLARY, in violation of Section 459 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE committed the following overt act and acts at and in the County of San Diego:

1.

On or about July 4, 2023, RODNEY ALLEN FLYNT, SR. entered Karrada Jewelry Stores located at 566 East Main Street in El Cajon, California.

2.

On or about November 1, 2023, MICHAEL ANTHONY JONES, JR., entered Banter by Piercing Pagoda located at 3030 Plaza Bonita Road in National City, California.

3.

On or about March 22, 2024, CHRISTOPHER SHAWN PATE, entered JC Penney located at 591 Broadway in Chula Vista, California.

4.

On or about April 16, 2024, RYAN KEITH PATE, entered JC Penney located at 2501 Ming Avenue in Bakersfield, California.

COUNT 4 – GRAND THEFT

On or about April 4, 2023, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., and MICHAEL ANTHONY JONES, JR., who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Banter By Piercing Pagoda Carlsbad.

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

COUNT 5 – GRAND THEFT

On or about April 24, 2023, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., and MICHAEL ANTHONY JONES, JR., who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Banter By Piercing Pagoda San Diego

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

COUNT 6 – GRAND THEFT

On or about May 17, 2023, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant MICHAEL ANTHONY JONES, JR., who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Kay Jewelers San Diego.

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

COUNT 7 – GRAND THEFT

On or about May 26, 2023, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant MICHAEL ANTHONY JONES, JR., who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise

from Kay Jewelers worth approximately \$12,500.00.

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

COUNT 8 – GRAND THEFT

On or about June 28, 2023, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., and MICHAEL ANTHONY JONES, JR., who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Zales Jewelers worth approximately \$21,667.00.

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

COUNT 9 – SECOND DEGREE COMMERCIAL BURGLARY

On or about July 4, 2023, in the County of San Diego, the crime of SECOND DEGREE COMMERCIAL BURGLARY, a violation of PENAL CODE SECTION 459, a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., and MICHAEL ANTHONY JONES, JR., who did enter a commercial building occupied Karrada Jewelry Stores, located at 566 E. Main St, El Cajon, CA, with the intent to commit larceny and any felony.

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

COUNT 10 – GRAND THEFT

On or about August 24, 2023, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants MICHAEL ANTHONY JONES, JR., and CHRISTOPHER SHAWN PATE who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Princess Jewelers El Cajon.

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

COUNT 11 – SECOND DEGREE ROBBERY

On or about August 24, 2023, in the County of San Diego, the crime of SECOND DEGREE ROBBERY, a violation of PENAL CODE SECTION 211, a Felony, was committed by defendants MICHAEL ANTHONY JONES, JR., and CHRISTOPHER SHAWN PATE, who did unlawfully and by means of force and fear take personal property from the person, possession, and immediate presence of Duraed Bustan.

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 657.5(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)

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

COUNT 12 – GRAND THEFT

On or about September 26, 2023, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., and CHRISTOPHER SHAWN PATE, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Banter By Piercing Pagoda Carlsbad

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

COUNT 13 – GRAND THEFT

On or about November 1, 2023, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., and CHRISTOPHER SHAWN PATE, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Marc Jacobs San Diego.

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

COUNT 14 – GRAND THEFT

On or about November 1, 2023, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., and CHRISTOPHER SHAWN PATE, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Banter By Piercing Pagoda National City

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

COUNT 15 – SECOND DEGREE COMMERCIAL BURGLARY

On or about November 1, 2023, in the County of San Diego, the crime of SECOND DEGREE COMMERCIAL BURGLARY, a violation of PENAL CODE SECTION 459, a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., and CHRISTOPHER SHAWN PATE, who did enter a commercial building occupied Banter By Piercing Pagoda National City, located at 3030 Plaza Bonita Road, National City CA, with the intent to commit larceny and any felony.

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

COUNT 16 – VANDALISM

On or about November 1, 2023, in the County of San Diego, the crime of VANDALISM, a violation of PENAL CODE SECTION 594(b)(1), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., and CHRISTOPHER SHAWN PATE, who did unlawfully and maliciously damage and destroy real and personal property not his or her own, belonging to Banter By Piercing Pagoda National City.

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

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

COUNT 17 – GRAND THEFT

On or about December 13, 2023, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR. and CHRISTOPHER SHAWN PATE, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Banter By Piercing Pagoda Escondido

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

COUNT 18 – SECOND DEGREE ROBBERY

On or about December 13, 2023, in the County of San Diego, the crime of SECOND DEGREE ROBBERY, a violation of PENAL CODE SECTION 211, a Felony, was committed by defendants, RODNEY ALLEN FLYNT, SR. and CHRISTOPHER SHAWN PATE, who did unlawfully and by means of force and fear take personal property from the person, possession, and immediate presence of Joshua Gomez.

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 657.5(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

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

COUNT 19 – VANDALISM

On or about December 13, 2023, in the County of San Diego, the crime of VANDALISM, a violation of PENAL CODE SECTION 594(b)(1), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR. and CHRISTOPHER SHAWN PATE, who did unlawfully and maliciously damage and destroy real and personal property not his or her own, belonging to Banter By Piercing Pagoda Escondido.

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

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

COUNT 20 – GRAND THEFT

On or about January 12, 2024, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., and CHRISTOPHER SHAWN PATE, who did willfully and unlawfully take personal property of another

of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Banter By Piercing Pagoda National City

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

COUNT 21 – SECOND DEGREE COMMERCIAL BURGLARY

On or about February 12, 2024, in the County of San Diego, the crime of SECOND DEGREE COMMERCIAL BURGLARY, a violation of PENAL CODE SECTION 459, a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, who did enter a commercial building occupied by Banter By Piercing Pagoda National City, located at 3030 Plaza Bonita Road, National City CA, with the intent to commit larceny and any felony.

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

COUNT 22 – GRAND THEFT

On or about February 18, 2024, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR. and MICHAEL ANTHONY JONES, JR., who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from JC Penney – San Diego.

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

COUNT 23 – GRAND THEFT

On or about March 22, 2024, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from JC Penney – Chula Vista.

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

COUNT 24 – SECOND DEGREE COMMERCIAL BURGLARY

On or about March 22, 2024, in the County of San Diego, the crime of SECOND DEGREE COMMERCIAL BURGLARY, a violation of PENAL CODE SECTION 459, a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE who did enter a commercial building occupied by JC Penney, located at 591 Broadway, Chula Vista, CA 91910, with the intent to commit larceny and any felony.

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

COUNT 25 – GRANDTHEFT

On or about March 30, 2024, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Banter by Piercing Pagoda – Mission Viejo.

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

COUNT 26 – SECOND DEGREE COMMERCIAL BURGLARY

On or about March 30, 2024, in the County of Orange, the crime of SECOND DEGREE COMMERCIAL BURGLARY, a violation of PENAL CODE SECTION 459, a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE who did enter a commercial building occupied by Banter by Piercing Pagoda, located at Shops At Mission Viejo, #104, Mission Viejo, CA, with the intent to commit larceny and any felony.

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

COUNT 27 – GRANDTHEFT

On or about April 16, 2024, in the County of Kern, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from JC Penney – Bakersfield.

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

COUNT 28 – SECOND DEGREE COMMERCIAL BURGLARY

On or about April 16, 2024, in the County of Kern, the crime of SECOND DEGREE COMMERCIAL BURGLARY, a violation of PENAL CODE SECTION 459, a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE who did enter a commercial building occupied by JC Penney, located at 2501 Ming Avenue, Bakersfield, CA, with the intent to commit larceny and any felony.

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

COUNT 29 – GRANDTHEFT

On or about May 8, 2024, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from JC Penney

– National City.

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

COUNT 30 – SECOND DEGREE COMMERCIAL BURGLARY

On or about May 8, 2024, in the County of San Diego, the crime of SECOND DEGREE COMMERCIAL BURGLARY, a violation of PENAL CODE SECTION 459, a Felony, was committed by defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE who did enter a commercial building occupied by JC Penney, located at 3040 Plaza Bonita Rd, National City, CA 91950, with the intent to commit larceny and any felony.

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

CIRCUMSTANCES IN AGGRAVATION (CALIFORNIA RULE OF COURT 4.421; PENAL CODE SECTION 1170(B)(2))

It is further alleged as to all charges, that RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE per PENAL CODE SECTION 1170(b)(2) and within the meaning of Rule 4.421 of the California Rules of Court, that there exist circumstances in aggravation including the following factors:

1. The defendant(s) induced others to participate in the commission of the crime or occupied a position of leadership or dominance of other participants in its commission (4.421(a)(4));
2. The manner in which the crime was carried out indicates planning, sophistication, or professionalism (4.421(a)(8));
3. The defendant(s) took advantage of a position of trust or confidence to commit the offense (4.421(a)(11)).

SPECIAL ALLEGATION

Furthermore, as to Counts 1, 4 through 8, 10, 12, 13, and 22 through 30, the offenses alleged are related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of, and resulted in the loss by Banter by Piercing Pagoda, Kay Jewelers, Zales Jewelers, Karrada Jewelry Stores, Princess Jewelry, Marc Jacob, and JC Penney of, more than five hundred thousand dollars (\$500,000), thus subjecting defendants RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, and RYAN KEITH PATE to the additional punishment provided for in Penal Code section 186.11(a)(2).

NOTICE: Prison custody time is to be served in state prison if the enhancement pursuant to Penal Code section 186.11 is imposed as part of the sentence for the above offense, within the meaning of Penal Code section 1170(h)(3).

PRIORS

RODNEY ALLEN FLYNT, SR.

STRIKE PRIOR(S)

And it is further alleged pursuant to Penal Code sections 667(b) through (i), 1170.12, and 688 that defendant, RODNEY ALLEN FLYNT, SR., has suffered the following prior conviction(s) and juvenile adjudication(s), which are now serious or violent felonies under California law whether committed in California or elsewhere:

Charge	Date of Conviction	Court Number	Court	County	State
PC 211	05/03/2012	SCD237709	Superior Court	San Diego	CA

NOTICE: Pursuant to PENAL CODE SECTION 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by PENAL CODE SECTION 1054.3.

NOTICE: Pursuant to Penal Code Section 296(e), the court shall order collection of DNA from the defendant(s) if advised by the prosecuting attorney that a sample is required but has not been provided by the defendant(s). Pursuant to Penal Code sections 296/296.1, if not already required from a past conviction, any defendants who have not done so will be required to provide a sample upon conviction of this felony offense.

Further, attached and incorporated herein are official reports, documents, and/or a declaration of a law enforcement agency, which the undersigned believes establish probable cause for the arrest of the defendant(s), RODNEY ALLEN FLYNT, SR., MICHAEL ANTHONY JONES, JR., CHRISTOPHER SHAWN PATE, RYAN KEITH PATE, for the above-listed crimes. Wherefore, a warrant of arrest is request for said defendants.

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

Executed at City of San Diego, County of San Diego, State of California, on May 23, 2024.

WEBSTER DECLARANT AND
COMPLAINANT)

CAL DOJ CRIMINAL INVESTIGATOR #31



INFORMATION

ROB BONTA
ATTORNEY GENERAL OF CALIFORNIA

by:

DEPUTY ATTORNEY GENERAL

5/23/24
Date