

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA CLARA

HALL OF JUSTICE

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

FELONY COMPLAINT  
CASE SUMMARY

vs.

DA NO: 210914559

CEN

EDT244 MPT WARR

DWS060 AMS WARR

EFB669 SDC WARR

EGJ188 RCR WARR

MARION PAUL TILLEY [REDACTED]  
aka MARION TILLEY,  
[REDACTED] CAMPBELL CA  
95008

ANTON MALIK SALAAM ([REDACTED])  
[REDACTED] MOUNTAIN  
VIEW CA 94043

SHAMELIA DEMONICA CLAY ([REDACTED])  
[REDACTED] CAMPBELL  
CA 95008

RICO CORNELIUS RAUSHING ([REDACTED])  
[REDACTED] FRESNO CA 93706

Defendant(s).

CASE SUMMARY

Count	Charge	Charge Range	Defendant
1	PC490.4(a)(1)	16-2-3	Marion Paul Tilley Anton Malik Salaam Shamelia Demonica Clay Rico Cornelius Raushing
2	PC496(a)		Marion Paul Tilley Shamelia Demonica Clay
3	PC273a(a)	2-4-6	Shamelia Demonica Clay
4	PC29800(a)(1)	16-2-3	Marion Paul Tilley

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA CLARA

HALL OF JUSTICE

COMPLAINT FOR ARREST WARRANT(S)  
ANTON MALIK SALAAM DWS060  
MARION PAUL TILLEY EDT244  
SHAMELIA DEMONICA CLAY EFB669  
RICO CORNELIUS RAUSHING EGJ188

THE PEOPLE OF THE STATE OF CALIFORNIA,

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[REDACTED]  
CAMPBELL CA 95008

RICO CORNELIUS RAUSHING ([REDACTED])  
[REDACTED] FRESNO CA 93706

Defendant(s).

**IN ON OTHERS**

Filed  
September 20, 2021  
Clerk of the Court  
Superior Court of CA  
County of Santa Clara  
C2112495  
By: molaivar

The undersigned is informed and believes that:

**COUNT 1**

On or about and between September 12, 2020 and February 15, 2021, in the County of Santa Clara, State of California, the crime of ORGANIZED RETAIL THEFT: TWO OR MORE OCCASIONS AND VALUE EXCEEDING \$950, in violation of PENAL CODE SECTION 490.4(a)(1), a Felony, was committed by MARION PAUL TILLEY, ANTON MALIK SALAAM, SHAMELIA DEMONICA CLAY AND RICO CORNELIUS RAUSHING who did , act in concert with one or more persons to steal merchandise from one or more merchant's premises or online marketplace on two or more separate occasions within a 12-month period, and with an aggregate value exceeding nine hundred fifty dollars (\$950), with the intent to sell and exchange and return the merchandise for value.

**COUNT 2**

On or about January 15, 2021, in the County of Santa Clara, State of California, the crime of BUYING AND RECEIVING STOLEN PROPERTY- VALUE UNDER \$950, in violation of PENAL CODE SECTION 496(a), a Misdemeanor, was committed by MARION PAUL TILLEY AND SHAMELIA DEMONICA CLAY who did buy and receive property, jewelry, with a value that does not exceed nine hundred fifty dollars (\$950), that had been stolen, knowing the property to have been stolen.

**COUNT 3**

On or about January 15, 2021, in the County of Santa Clara, State of California, the crime of ENDANGERING OR INJURING THE HEALTH OF A CHILD, in violation of PENAL CODE SECTION 273a(a), a Felony, was committed by SHAMELIA DEMONICA CLAY who did under circumstances and conditions likely to produce great bodily harm and death, and while having the care and custody of a child, Avery.C, willfully caused and permitted the person and health of the child to be injured, and willfully caused and permitted the child to be placed in a situation where his/her person and health were endangered.

**COUNT 4**

On or about January 15, 2021, in the County of Santa Clara, State of California, the crime of OWNING, PURCHASING, RECEIVING, AND POSSESSION OF A FIREARM BY A FELON, in violation of PENAL CODE SECTION 29800(a)(1), a Felony, was committed by MARION PAUL TILLEY who did, having been convicted of Infliction of Corporal Injury on Spouse Cohabitant and False Imprisonment, a felony, in violation of Penal Code 273.5(a) of the State of California, own, purchase, receive and have in his or her possession, and under his or her custody and control a Anderson AM-15 short-barreled rifle, a firearm.

Any defendant, including a juvenile, who is convicted of and pleads guilty and no contest to any felony offense, including any attempt to commit the offense, charged in this complaint or information is required to provide buccal swab samples, right thumbprints and a full palm print impression of each hand, and any blood specimens or other biological samples required pursuant to the DNA and Forensic Identification Database and Data Bank Act of 1998 and Penal Code section 296, et seq.

Further, attached and incorporated by reference are official reports and documents of a law enforcement agency which the complainant believes establish probable cause for the arrest of defendant MARION PAUL TILLEY, for the above-listed crimes. Wherefore, A WARRANT OF ARREST IS REQUESTED.

Further, attached and incorporated by reference are official reports and documents of a law enforcement agency which the complainant believes establish probable cause for the arrest of defendant ANTON MALIK SALAAM, for the above-listed crimes. Wherefore, A WARRANT OF ARREST IS REQUESTED.

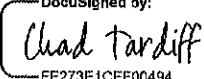
Further, attached and incorporated by reference are official reports and documents of a law enforcement agency which the complainant believes establish probable cause for the arrest of defendant SHAMELIA DEMONICA CLAY, for the above-listed crimes. Wherefore, A WARRANT OF ARREST IS REQUESTED.

Further, attached and incorporated by reference are official reports and documents of a law enforcement agency which the complainant believes establish probable cause for the arrest of defendant RICO CORNELIUS RAUSHING, for the above-listed crimes. Wherefore, A WARRANT OF ARREST IS REQUESTED.

Complainant therefore requests that the defendant(s) be dealt with according to law.

I certify under penalty of perjury that the above is true and correct.

Executed on September 13, 2021, in SANTA CLARA County, California.

DocuSigned by:  
  
 FE273E1CFE00494  
 chad Tardiff 19850  
 (Tardiff 19850)  
 CHP M28531620  
 ATTY GENERAL / D1000/ FELONY/ YM

09/21/2021

/s/ Colin, Paul O.

Judge of the Superior Court  
of California

Cash or Bond \$ \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_  
JUDGE OF THE SUPERIOR COURT

Warrant Received for Service by:

on \_\_\_\_\_

THE FOREGOING INSTRUMENT IS  
A CORRECT COPY OF THE ORIGINAL  
ON FILE IN THIS OFFICE

NOV 15 2021

Clerk of the Court  
SUPERIOR COURT OF CA COUNTY OF SANTA CLARA  
BY E. Kremenskotter DEPUTY  
E. KREMENSKOTTER

