

APR 10 2023

DAVID H. YAMASAKI, Clerk of the Court

BY: E. SANCHEZ, DEPUTY

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7 [REDACTED]  
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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF ORANGE  
11

12 **THE PEOPLE OF THE STATE OF**  
13 **CALIFORNIA,**

14 Plaintiff,

15 v.

16 **1) JOSE ANTONIO DELASANCHA**  
17 [REDACTED]

18 **2) LUIS ALBERTO DELASANCHA**  
19 [REDACTED]

20 **3) EVERARDO CARRILLO-AVILEZ**  
21 [REDACTED]

22 **4) AGUSTIN GARFIAZ JR.**  
23 [REDACTED]

Defendants.

Case No. **23CF1131**

CHP: ORC00250923

**FELONY COMPLAINT FOR ARREST  
WARRANT**

24 The Attorney General of the State of California accuses the above-named defendants of the  
25 following offenses, based on information and belief, which are connected to each other in their  
26 commission:

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**COUNT 1**

On or between October 15, 2021 and February 24, 2023, in the counties of Orange, Los Angeles, and San Diego, the crime of ORGANIZED RETAIL THEFT, a violation of PENAL CODE SECTION 490.4(a), a Felony, was committed by defendants JOSE ANTONIO DELASANCHA, LUIS ALBERTO DELASANCHA, EVERARDO CARRILLO-AVILEZ, and AGUSTIN GARFIAZ Jr., who did unlawfully act in concert with one or more person to steal merchandise from one or more merchant’s 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: Merchandise from The Home Depot worth approximately \$76,640.50.

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

**COUNT 2**

On or about October 15, 2021, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,216.00.

**COUNT 3**

On or about October 16, 2021, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,200.00.

**COUNT 4**

On or about October 22, 2021, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants JOSE

1 ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and  
2 unlawfully take personal property of another of a value exceeding nine hundred fifty dollars  
3 (\$950), to wit: Merchandise from The Home Depot worth approximately \$2,500.00.

4 **COUNT 5**

5 On or about October 23, 2021, in the County of Orange, the crime of GRAND THEFT, a  
6 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE  
7 ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another  
8 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
9 Depot worth approximately \$1,500.00.

10 **COUNT 6**

11 On or about November 19, 2021, in the County of Orange, the crime of GRAND THEFT, a  
12 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE  
13 ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another  
14 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
15 Depot worth approximately \$2,000.00.

16 **COUNT 7**

17 On or about November 24, 2021, in the County of Los Angeles, the crime of GRAND  
18 THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant  
19 JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of  
20 another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The  
21 Home Depot worth approximately \$1,600.00.

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

24 **COUNT 8**

25 On or about November 28, 2021, in the County of San Diego, the crime of GRAND  
26 THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants  
27 JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully  
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1 and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars  
2 (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,200.00.

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

5 **COUNT 9**

6 On or about December 12, 2021, in the County of Orange, the crime of GRAND THEFT, a  
7 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE  
8 ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another  
9 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
10 Depot worth approximately \$1,000.00.

11 **COUNT 10**

12 On or about December 23, 2021, in the County of San Diego, the crime of GRAND  
13 THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants  
14 JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully  
15 and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars  
16 (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,512.00.

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

19 **COUNT 11**

20 On or about December 29, 2021, in the County of Orange, the crime of GRAND THEFT, a  
21 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE  
22 ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another  
23 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
24 Depot worth approximately \$3,122.00.

25 **COUNT 12**

26 On or about January 7, 2022, in the County of Orange, the crime of GRAND THEFT, a  
27 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE  
28 ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another

1 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
2 Depot worth approximately \$1,403.00.

3 **COUNT 13**

4 On or about January 11, 2022, in the County of Orange, the crime of GRAND THEFT, a  
5 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE  
6 ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another  
7 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
8 Depot worth approximately \$1,281.00.

9 **COUNT 14**

10 On or about January 12, 2022, in the County of Orange, the crime of GRAND THEFT, a  
11 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant LUIS  
12 ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another  
13 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
14 Depot worth approximately \$1,216.00.

15 **COUNT 15**

16 On or about January 20, 2022, in the County of Orange, the crime of GRAND THEFT, a  
17 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE  
18 ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another  
19 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
20 Depot worth approximately \$1,200.00.

21 **COUNT 16**

22 On or about January 22, 2022, in the County of Orange, the crime of GRAND THEFT, a  
23 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE  
24 ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another  
25 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
26 Depot worth approximately \$987.00.

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**COUNT 17**

On or about January 24, 2022, in the County of Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,316.00.

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

**COUNT 18**

On or about January 26, 2022, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,345.00.

**COUNT 19**

On or about January 27, 2022, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,000.00.

**COUNT 20**

On or about January 28, 2022, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,107.00.

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**COUNT 21**

On or about January 29, 2022, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,147.00.

**COUNT 22**

On or about January 30, 2022, 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 LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,317.00.

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

**COUNT 23**

On or about January 31, 2022, in the County of Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,500.00.

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

**COUNT 24**

On or about February 4, 2022, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$950.00.

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**COUNT 25**

On or about February 9, 2022, in the County of Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$950.00.

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

**COUNT 26**

On or about December 7, 2022, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,743.00.

**COUNT 27**

On or about December 8, 2022, in the County of Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$3,725.00.

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

**COUNT 28**

On or about December 31, 2022, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,434.00.



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**COUNT 29**

On or about January 15, 2023, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,686.00.

**COUNT 30**

On or about January 19, 2023, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,596.00.

**COUNT 31**

On or about January 20, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,279.50.

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

**COUNT 32**

On or about January 21, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,058.00.

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

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**COUNT 33**

On or about January 22, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,377.00.

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

**COUNT 34**

On or about January 23, 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 JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,197.00.

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

**COUNT 35**

On or about January 26, 2023, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,000.00.

**COUNT 36**

On or about January 27, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(e), a Felony, was committed by defendants JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,600.00.

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

3 **COUNT 37**

4 On or about January 29, 2023, in the County of Orange, the crime of GRAND THEFT, a  
5 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant LUIS  
6 ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another  
7 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
8 Depot worth approximately \$1,317.00.

9 **COUNT 38**

10 On or about January 30, 2023, in the County of Los Angeles, the crime of GRAND  
11 THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants  
12 JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully  
13 and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars  
14 (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,200.00.

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

17 **COUNT 39**

18 On or about January 31, 2023, in the County of Los Angeles, the crime of GRAND  
19 THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants  
20 JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully  
21 and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars  
22 (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,058.00.

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

25 **COUNT 40**

26 On or about February 2, 2023, in the County of Orange, the crime of GRAND THEFT, a  
27 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants JOSE  
28 ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and

1 unlawfully take personal property of another of a value exceeding nine hundred fifty dollars  
2 (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,250.00.

3 **COUNT 41**

4 On or about February 2, 2023, in the County of San Diego, the crime of GRAND THEFT, a  
5 violation of PENAL CODE SECTION 487(e), a Felony, was committed by defendants JOSE  
6 ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and  
7 unlawfully take personal property of another of a value exceeding nine hundred fifty dollars  
8 (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,900.00.

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

11 **COUNT 42**

12 On or about February 3, 2023, in the County of San Diego, the crime of GRAND THEFT, a  
13 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE  
14 ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another  
15 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
16 Depot worth approximately \$987.00.

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

19 **COUNT 43**

20 On or about February 4, 2023, in the County of San Diego, the crime of GRAND THEFT, a  
21 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE  
22 ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another  
23 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home  
24 Depot worth approximately \$987.00.

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

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**COUNT 44**

On or about February 5, 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 JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,542.00.

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

**COUNT 45**

On or about February 7, 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 JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,542.00.

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

**COUNT 46**

On or about February 7, 2023, in the County of San Diego, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(e), a Felony, was committed by defendants JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,077.00.

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

**COUNT 47**

On or about February 9, 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 JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and

1 unlawfully take personal property of another of a value exceeding nine hundred fifty dollars  
2 (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,200.00.

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

5 **COUNT 48**

6 On or about February 11, 2023, in the County of Los Angeles, the crime of GRAND  
7 THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants  
8 JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully  
9 and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars  
10 (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,200.00.

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

13 **COUNT 49**

14 On or about February 11, 2023, in the County of Los Angeles, the crime of GRAND  
15 THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants  
16 JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully  
17 and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars  
18 (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,200.00.

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

21 **COUNT 50**

22 On or about February 12, 2023, in the County of Los Angeles, the crime of GRAND  
23 THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant  
24 JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of  
25 another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The  
26 Home Depot worth approximately \$1,000.00.

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

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**COUNT 51**

On or about February 13, 2023, in the Counties of Orange and Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(e), a Felony, was committed by defendant JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,600.00.

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

**COUNT 52**

On or about February 18, 2023, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,027.00.

**COUNT 53**

On or about February 20, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(e), a Felony, was committed by defendants JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,415.00.

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

**COUNT 54**

On or about February 24, 2023, in the County of Orange, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants JOSE ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home Depot worth approximately \$1,316.00.

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**COUNT 55**

On or between January 26, 2023 and February 28, 2023, in the Counties of Orange and Los Angeles, the crime of RECEIVING STOLEN PROPERTY, a violation of PENAL CODE SECTION 496(a), a Felony, was committed by defendant EVERARDO CARRILLO-AVILEZ, who did unlawfully receive personal property of another, to wit: Merchandise from The Home Depot worth approximately \$3,878.00.

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

**COUNT 56**

On or about February 7, 2023, in the Counties of San Diego and Los Angeles, the crime of RECEIVING STOLEN PROPERTY, a violation of PENAL CODE SECTION 496(a), a Felony, was committed by defendant AGUSTIN GARFIAZ Jr., who did unlawfully receive personal property of another, to wit: Merchandise from The Home Depot worth approximately \$2,619.00.

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

**SPECIAL ALLEGATION 1**

**PRIOR SERIOUS FELONY**

It is further alleged as to Counts 1, 2, 4 through 13, 15 through 18, 23 through 36, and 38 through 54, pursuant to PENAL CODE sections 667(d) and (e)(1) and 1170.12(b) and (c)(1), that the said Defendant, JOSE ANTONIO DELASANCHA, previously suffered a serious and violent felony conviction and adjudication:

JOSE ANTONIO DELASANCHA was previously convicted of a violation of Section 211/212.5(c) of the PENAL CODE on or about July 22, 2021, in the SUPERIOR Court of the State of California, in and for the County of ORANGE, case number: 20WF2089.



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**SPECIAL ALLEGATION 2**

**AGGRAVATING FACTORS AS TO JOSE ANTONIO DELASANCHA**

As to Counts 1, 2, 4 through 13, 15 through 18, 23 through 36, and 38 through 54, it is further alleged that the People will seek findings from the jury on factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

Pursuant to **California Rules of Court, Rule 4.421(a)**:

- (a)(8) The manner in which the crimes was carried out indicates planning, sophistication, or professionalism;
- (a)(9) The crimes involved an attempted or actual taking or damage of great monetary value; and
- (a)(10) The crimes involved a large quantity of contraband.

Pursuant to **California Rules of Court, Rule 4.421(b)**:

- (b)(1) The defendant has engaged in violent conduct that indicates a serious danger to society;
- (b)(2) The defendant's prior convictions as an adult or sustained petitions in juvenile delinquency proceedings are numerous or of increasing seriousness;
- (b)(3) The defendant has served a prior term in prison or county jail under section 1170(h);
- (b)(4) The defendant was on probation, mandatory supervision, postrelease community supervision, or parole when the crime was committed; and
- (b)(5) The defendant's prior performance on probation, mandatory supervision, postrelease community supervision, or parole was unsatisfactory.

**SPECIAL ALLEGATION 3**

**AGGRAVATING FACTORS AS TO LUIS ALBERTO DELASANCHA**

As to Counts 1, 3, 4, 8, 10, 14, 19 through 21, 22, 34 through 41, and 45 through 49, 52 and 54, it is further alleged that the People will seek findings from the jury on factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

Pursuant to **California Rules of Court, Rule 4.421(a)**:

- (a)(8) The manner in which the crimes was carried out indicates planning, sophistication, or professionalism;
- (a)(9) The crimes involved an attempted or actual taking or damage of great monetary value; and
- (a)(10) The crimes involved a large quantity of contraband.

Pursuant to **California Rules of Court, Rule 4.421(b)**:

- (b)(2) The defendant's prior convictions as an adult or sustained petitions in juvenile delinquency proceedings are numerous or of increasing seriousness;
- (b)(3) The defendant has served a prior term in prison or county jail under section 1170(h);
- (b)(4) The defendant was on probation, mandatory supervision, postrelease community supervision, or parole when the crime was committed; and

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(b)(5) The defendant's prior performance on probation, mandatory supervision, postrelease community supervision, or parole was unsatisfactory.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 56 COUNTS.

Executed at Santa Ana, County of Orange, on April 10, 2023.

Dated: April 10, 2023

By: Kristina Gannon

KRISTINA GANNON  
Deputy Attorney General

For: ROB BONTA  
Attorney General of California

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**NOTICE TO DEFENDANT AND DEFENDANT’S ATTORNEYS**

Pursuant to Penal Code section 1054.5(b), the People informally request that defense counsel provide discovery to the People as required by Penal Code section 1054.3.

**NOTICE TO ATTORNEYS**

Any materials accompanying this complaint or provided by the People in this case may contain information about witnesses. Such information is subject to Penal Code section 1054.2, which provides, “No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause.”

**NOTICE: Conviction of one or more of these offenses will require the defendant to provide a DNA sample and print impressions pursuant to Penal Code section 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.**