| 1 | ROB BONTA Attorney General of California | |
|-----|------------------------------------------------------------------------|----------------------------------------------------------|
| 2 | ROBIN ÚRBANSKI | |
| 3 | Supervising Deputy Attorney General BRENDON W. MARSHALL | FILED |
| 4 | Deputy Attorney General State Bar No. 292550 | SUPERIOR COURT OF CALIFORNIA COUNTY OF SAN BERNARDINO |
| 5 | 600 West Broadway, Suite 1800 San Diego, CA 92101 P.O. Box 85266 | APR 0 7 2025 |
| 6 | San Diego, CA 92186-5266 | Rua Quin |
| 7 | Telephone: (619) 738-9123 Fax: (619) 645-2191 | BY: Plina Phillips, Deputy |
| 8 | E-mail: Brendon.Marshall@doj.ca.gov Attorneys for Plaintiff | |
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| 10 | SUPERIOR COURT OF TH | E STATE OF CALIFORNIA |
| 11 | COUNTY OF SA | N BERNARDINO |
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| 13 | PEOPLE OF THE STATE OF | |
| 14 | CALIFORNIA, | Case No. FS625001355 |
| 15 | Plaintiff, | FELONY COMPLAINT |
| 16 | v. | TEEOTT COMPENIA |
| 150 | DAVID REDMOND | |
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| 18 | and | |
| 19 | BRIAN SEMINAR | |
| 20 | | |
| 21 | Defendants. | |
| 22 | | |
| 23 | The undersigned, certifying upon informati | ion and belief, complains that in the County of |
| 24 | San Bernardino, State of California, defendant di | d commit the following crimes: |
| 25 | COU | NT 1 |
| 26 | On or about January 12, 2025, in the Count | ry of San Bernardino, the crime of FELON IN |
| 27 | POSSESSION OF A FIREARM, in violation of I | PENAL CODE SECTION 29800(a)(1), a felony, |
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| 1 | was committed by David Redmond, who did own or possess a firearm, knowing that he was |
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| 2 | prohibited from doing so by a prior felony conviction, to wit: Ruger 10-22 SN # |
| 3 | COUNT 2 |
| 4 | On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN |
| 5 | POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, |
| 6 | was committed by David Redmond, who did own or possess a firearm, knowing that he was |
| 7 | prohibited from doing so by a prior felony conviction, to wit: Remington 700 SN # |
| 8 | COUNT 3 |
| 9 | On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN |
| 10 | POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, |
| 11 | was committed by David Redmond, who did own or possess a firearm, knowing that he was |
| 12 | prohibited from doing so by a prior felony conviction, to wit: Arsenal SLR1015 SN# |
| 13 | |
| 14 | COUNT 4 |
| 15 | On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN |
| 16 | POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, |
| 17 | was committed by David Redmond, who did own or possess a firearm, knowing that he was |
| 18 | prohibited from doing so by a prior felony conviction, to wit: Ruler 10-22 SN # |
| 19 | COUNT 5 |
| 20 | On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN |
| 21 | POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, |
| 22 | was committed by David Redmond, who did own or possess a firearm, knowing that he was |
| 23 | prohibited from doing so by a prior felony conviction, to wit: Springfield Socom 16 SN # |
| 24 | COUNT 6 |
| 25 | On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN |
| 26 | POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, |
| 27 | was committed by David Redmond, who did own or possess a firearm, knowing that he was |

| 1 | prohibited from doing so by a prior felony conviction, to wit: Benelli M1 Super 90 SN # |
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| 3 | COUNT 7 |
| 4 | On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN |
| 5 | POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, |
| 6 | was committed by David Redmond, who did own or possess a firearm, knowing that he was |
| 7 | prohibited from doing so by a prior felony conviction, to wit: Remington Sportsman 58 SN # |
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| 9 | COUNT 8 |
| 10 | On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN |
| 11 | POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, |
| 12 | was committed by David Redmond, who did own or possess a firearm, knowing that he was |
| 13 | prohibited from doing so by a prior felony conviction, to wit: Ruger Mark II SN # |
| 14 | COUNT 9 |
| 15 | On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN |
| 16 | POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, |
| 17 | was committed by David Redmond, who did own or possess a firearm, knowing that he was |
| 18 | prohibited from doing so by a prior felony conviction, to wit: P80, unserialized, evidence # 004- |
| 19 | 014. |
| 20 | COUNT 10 |
| 21 | On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN |
| 22 | POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, |
| 23 | was committed by David Redmond, who did own or possess a firearm, knowing that he was |
| 24 | prohibited from doing so by a prior felony conviction, to wit: Glock 23 SN # |
| 25 | COUNT 11 |
| 26 | On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN |
| 27 | POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, |
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was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Sig Sauer P226 SN #

COUNT 12

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Wilkinson Arms Parma ID SN #

COUNT 13

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Ruger Single Six SN #

COUNT 14

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Ruger 10-22 SN #

COUNT 15

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Sig Sauer P228 SN #

COUNT 16

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Inter Arms 62 SA SN #

COUNT 17

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Ruger Mark II SN #

COUNT 18

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Browning Buckmark SN #

COUNT 19

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Glock 19 SN #

COUNT 20

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Aero Precision X15 SN #

COUNT 21

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Aero Precision M4E1 SN #

COUNT 22

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Remington 870 Express SN #

COUNT 23

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by David Redmond, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: P80, unserialized, evidence # 006-002.

COUNT 24

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF AMMUNITION, in violation of PENAL CODE SECTION 30305(a)(1), a felony, was committed by David Redmond, who did own or possess ammunition, knowing that he was prohibited from doing so by a prior felony conviction.

COUNT 25

On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL MANUFACTURING OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION 30600(a), a felony, was committed by David Redmond, did unlawfully manufacture, caused to the manufactured, an assault weapon, to wit: Aero Precision STS15 SN #

COUNT 26

On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL MANUFACTURING OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION 30600(a), a felony, was committed by David Redmond, did unlawfully manufacture, caused to the manufactured, an assault weapon, to wit: Aero Precision X15 SN #

| 1 | COUNT 27 |
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| 2 | On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL |
| 3 | MANUFACTURING OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION |
| 4 | 30600(a), a felony, was committed by David Redmond, did unlawfully manufacture, caused to |
| 5 | the manufactured, an assault weapon, to wit: LMT Defense Defender 2000 SN # |
| 6 | COUNT 28 |
| 7 | On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL |
| 8 | MANUFACTURING OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION |
| 9 | 30600(a), a felony, was committed by David Redmond, did unlawfully manufacture, caused to |
| 10 | the manufactured, an assault weapon, to wit: Aero Precision STS15 SN # |
| 11 | COUNT 29 |
| 12 | On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL |
| 13 | MANUFACTURING OF AN ASSAULT WEAPON, in violation of PENAL CODE SECTION |
| 14 | 30600(a), a felony, was committed by David Redmond, did unlawfully manufacture, caused to |
| 15 | the manufactured, an assault weapon, to wit: Aero Precision M4E1 SN # |
| 16 | COUNT 30 |
| 17 | On or about January 12, 2025, in the County of San Bernardino, the crime of UNLAWFUL |
| 18 | MACHINE GUN ACTIVITY, in violation of PENAL CODE SECTION 32625(b), a felony, was |
| 19 | committed by David Redmond, who did intentionally and unlawfully convert a firearm into a |
| 20 | machinegun, sell, offer for sale, or knowingly manufactured a machinegun, to wit: Aero Precision |
| 21 | X15 SN # |
| 22 | COUNT 31 |
| 23 | On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN |
| 24 | POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, |
| 25 | was committed by Brian Seminar, who did own or possess a firearm, knowing that he was |
| 26 | prohibited from doing so by a prior felony conviction, to wit: Glock 22 SN # |
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COUNT 32

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by Brian Seminar, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Polymer 80 19, unserialized, evidence # 001-004.

COUNT 33

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by Brian Seminar, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: Glock 26 SN #

COUNT 34

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF A FIREARM, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by Brian Seminar, who did own or possess a firearm, knowing that he was prohibited from doing so by a prior felony conviction, to wit: AR-15 style rifle, unserialized, evidence # 002-001.

COUNT 35

On or about January 12, 2025, in the County of San Bernardino, the crime of FELON IN POSSESSION OF AMMUNITION, in violation of PENAL CODE SECTION 30305(a)(1), a felony, was committed by Brian Seminar, who did own or possess ammunition, knowing that he was prohibited from doing so by a prior felony conviction.

NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

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 ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2(a)(1), which provides:

"[N]o attorney may disclose or permit to be disclosed to a defendant, members of the defendant's family, or anyone else, 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." I declare under penalty of perjury that the foregoing is true and correct and that this Felony Complaint consists of 35 Counts. Executed April 3, 2025, in San Diego, California. Respectfully Submitted, ROB BONTA Attorney General of California ROBIN URBANSKI Supervising Deputy Attorney General /s/Brendon W. Marshall BRENDON W. MARSHALL Deputy Attorney General Attorneys for Plaintiff SD2025801019