

APR 10 2023

DAVID H. YAMASAKI, Clerk of the Court

BY: E. SANCHEZ, DEPUTY

1 ROB BONTA
Attorney General of California
2 MICHAEL W. WHITAKER
Supervising Deputy Attorney General
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Deputy Attorney General
4 KRISTINA GANNON

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]

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
(DOB: 11/27/90)

17 2) LUIS ALBERTO DELASANCHA
18 (DOB: 04/08/92)

19 3) EVERARDO CARRILLO-AVILEZ
20 (DOB: 04/28/1983)

21 4) AGUSTIN GARFIAZ JR.
(DOB: 01/29/1997)

22 Defendants.

Case No. **23CF1131**

CHP: ORC00250923

**FELONY COMPLAINT FOR ARREST
WARRANT**

23 The Attorney General of the State of California accuses the above-named defendants of the
24 following offenses, based on information and belief, which are connected to each other in their
25 commission:
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1 **COUNT 1**

2 On or between October 15, 2021 and February 24, 2023, in the counties of Orange, Los
3 Angeles, and San Diego, the crime of ORGANIZED RETAIL THEFT, a violation of PENAL
4 CODE SECTION 490.4(a), a Felony, was committed by defendants JOSE ANTONIO
5 DELASANCHA, LUIS ALBERTO DELASANCHA, EVERARDO CARRILLO-AVILEZ, and
6 AGUSTIN GARFIAZ Jr., who did unlawfully act in concert with one or more person to steal
7 merchandise from one or more merchant's premises with the intent to sell, exchange, or return the
8 merchandise for value, in which the violations are committed on two or more separate occasions
9 within a twelve month period, in which the aggregate value of the merchandise stolen, received,
10 purchased or possessed, is in excess of Nine Hundred and Fifty Dollars (\$950), to wit:

11 Merchandise from The Home Depot worth approximately \$76,640.50.

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

14 **COUNT 2**

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

20 **COUNT 3**

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

26 **COUNT 4**

27 On or about October 22, 2021, in the County of Orange, the crime of GRAND THEFT, a
28 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
28

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 DELASANCHIA, 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 DELASANCHIA and LUIS ALBERTO DELASANCHIA, 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 DELASANCHIA, 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 DELASANCHIA, 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.

1 **COUNT 17**

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

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

9 **COUNT 18**

10 On or about January 26, 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 JOSE
12 ANTONIO 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 \$1,345.00.

15 **COUNT 19**

16 On or about January 27, 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 LUIS
18 ALBERTO 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 \$1,000.00.

21 **COUNT 20**

22 On or about January 28, 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 LUIS
24 ALBERTO 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 \$1,107.00.

1 **COUNT 21**

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

7 **COUNT 22**

8 On or about January 30, 2022, in the County of San Diego, the crime of GRAND THEFT, a
9 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant LUIS
10 ALBERTO DELASANCHA, who did willfully and unlawfully take personal property of another
11 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home
12 Depot worth approximately \$1,317.00.

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

15 **COUNT 23**

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

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

23 **COUNT 24**

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

1 **COUNT 25**

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

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

9 **COUNT 26**

10 On or about December 7, 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 JOSE
12 ANTONIO 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 \$1,743.00.

15 **COUNT 27**

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

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

23 **COUNT 28**

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

1 **COUNT 29**

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

7 **COUNT 30**

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

13 **COUNT 31**

14 On or about January 20, 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 defendant
16 JOSE ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of
17 another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The
18 Home Depot worth approximately \$1,279.50.

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 32**

22 On or about January 21, 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 \$1,058.00.

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

1 **COUNT 33**

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

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

9 **COUNT 34**

10 On or about January 23, 2023, in the County of San Diego, the crime of GRAND THEFT, a
11 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants JOSE
12 ANTONIO DELASANCHIA and LUIS ALBERTO DELASANCHIA, who did willfully and
13 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 \$1,197.00.

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 35**

18 On or about January 26, 2023, in the County of Orange, the crime of GRAND THEFT, a
19 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants JOSE
20 ANTONIO DELASANCHIA and LUIS ALBERTO DELASANCHIA, who did willfully and
21 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 \$1,000.00.

23 **COUNT 36**

24 On or about January 27, 2023, in the County of Los Angeles, the crime of GRAND
25 THEFT, a violation of PENAL CODE SECTION 487(e), a Felony, was committed by defendants
26 JOSE ANTONIO DELASANCHIA and LUIS ALBERTO DELASANCHIA, who did willfully
27 and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars
28 (\$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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1 **COUNT 44**

2 On or about February 5, 2023, in the County of San Diego, the crime of GRAND THEFT, a
3 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant JOSE
4 ANTONIO DELASANCHA, who did willfully and unlawfully take personal property of another
5 of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from The Home
6 Depot worth approximately \$1,542.00.

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

9 **COUNT 45**

10 On or about February 7, 2023, in the County of San Diego, the crime of GRAND THEFT, a
11 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants JOSE
12 ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and
13 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 \$1,542.00.

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 46**

18 On or about February 7, 2023, in the County of San Diego, the crime of GRAND THEFT, a
19 violation of PENAL CODE SECTION 487(e), a Felony, was committed by defendants JOSE
20 ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and
21 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 \$1,077.00.

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 47**

26 On or about February 9, 2023, in the County of San Diego, 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 \$1,200.00.

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.

1 **COUNT 51**

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

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

9 **COUNT 52**

10 On or about February 18, 2023, in the County of Orange, the crime of GRAND THEFT, a
11 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants JOSE
12 ANTONIO DELASANCHA and LUIS ALBERTO DELASANCHA, who did willfully and
13 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 \$1,027.00.

15 **COUNT 53**

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

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

23 **COUNT 54**

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

1 **COUNT 55**

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

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

9 **COUNT 56**

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

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

16 **SPECIAL ALLEGATION 1**

17 **PRIOR SERIOUS FELONY**

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

22 JOSE ANTONIO DELASANCHA was previously convicted of a violation of Section
23 211/212.5(c) of the PENAL CODE on or about July 22, 2021, in the SUPERIOR Court of the
24 State of California, in and for the County of ORANGE, case number: 20WF2089.
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1 **SPECIAL ALLEGATION 2**

2 **AGGRAVATING FACTORS AS TO JOSE ANTONIO DELASANCHIA**

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

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

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

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

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

17 **SPECIAL ALLEGATION 3**

18 **AGGRAVATING FACTORS AS TO LUIS ALBERTO DELASANCHIA**

19 As to Counts 1, 3, 4, 8, 10, 14, 19 through 21, 22, 34 through 41, and 45 through 49, 52 and
20 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:

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

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

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

- 27 (b)(2) The defendant's prior convictions as an adult or sustained petitions in juvenile
delinquency proceedings are numerous or of increasing seriousness;
28 (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

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

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

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

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7 Dated: April 10, 2023

By: Kristina Gannon

8 KRISTINA GANNON
9 Deputy Attorney General

10 For: ROB BONTA
11 Attorney General of California
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1 **NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEYS**

2 Pursuant to Penal Code section 1054.5(b), the People informally request that defense
3 counsel provide discovery to the People as required by Penal Code section 1054.3.
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5 **NOTICE TO ATTORNEYS**

6 Any materials accompanying this complaint or provided by the People in this case may
7 contain information about witnesses. Such information is subject to Penal Code section 1054.2,
8 which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or
9 telephone number of a victim or witness whose name is disclosed to the attorney pursuant to
10 subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a
11 hearing and a showing of good cause."
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13 **NOTICE: Conviction of one or more of these offenses will require the defendant to**
14 **provide a DNA sample and print impressions pursuant to Penal Code section 296 and 296.1.**
15 **Willful refusal to provide the samples and impressions is a crime.**
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