

It is further alleged that the aforesaid attempted murder was committed willfully, deliberately and with premeditation within the meaning of Penal Code section 664(a) and is a serious felony pursuant to Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c).

COUNT 3

On or about March 23, 2011, in the above named judicial district, the crime of TORTURE, in violation of PENAL CODE SECTION 206, a felony, was committed by Ian Anthony Roderiquez, who did unlawfully and with the intent to cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon John Doe # 2 (DOB: 04/19/1998).

"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: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

COUNT 4

On or about March 23, 2011, in the above named judicial district, the crime of CHILD ABUSE, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Ian Anthony Roderiquez, who did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, John Doe # 2 (DOB: 04/19/1998), to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his person and health was endangered.

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5

limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

It is further alleged as to count 4 that in the commission of the above offense the said defendant, Ian Anthony Roderiquez, personally inflicted great bodily injury upon John Doe # 2 (DOB: 04/19/1998), not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8).

COUNT 5

On or about March 23, 2011, in the above named judicial district, the crime of TORTURE, in violation of PENAL CODE SECTION 206, a felony, was committed by Ian Anthony Roderiquez, who did unlawfully and with the intent to cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon John Doe # 3 (DOB: 04/10/1997).

"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: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

COUNT 6

On or about March 23, 2011, in the above named judicial district, the crime of CHILD ABUSE, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Ian Anthony Roderiquez, who did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, John Doe # 3 (DOB: 04/10/1997), to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and

custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his person and health was endangered.

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

It is further alleged as to count 6 that in the commission of the above offense the said defendant, Ian Anthony Roderiquez, personally inflicted great bodily injury upon John Doe # 3 (DOB: 04/10/1997), not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8).

COUNT 7

On or about March 23, 2011, in the above named judicial district, the crime of TORTURE, in violation of PENAL CODE SECTION 206, a felony, was committed by Ian Anthony Roderiquez, who did unlawfully and with the intent to cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon Jane Doe # 2 (DOB: 07/07/2000).

"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: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

COUNT 8

On or about March 23, 2011, in the above named judicial district, the crime of CHILD ABUSE, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Ian Anthony Roderiquez, who did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, Jane Doe # 2 (DOB: 07/07/2000), to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that her person and health was endangered.

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

It is further alleged as to count 8 that in the commission of the above offense the said defendant, Ian Anthony Roderiquez, personally inflicted great bodily injury upon Jane Doe # 2 (DOB: 07/07/2000), not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8).

COUNT 9

On or about March 23, 2011, in the above named judicial district, the crime of TORTURE, in violation of PENAL CODE SECTION 206, a felony, was committed by Ian Anthony Roderiquez, who did unlawfully and with the intent to cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon Jane Doe # 3 (DOB: 05/19/2002).

"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: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

COUNT 10

On or about March 23, 2011, in the above named judicial district, the crime of CHILD ABUSE, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Ian Anthony Roderiquez, who did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, Jane Doe # 3 (DOB: 05/19/2002), to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that her person and health was endangered.

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

It is further alleged as to count 10 that in the commission of the above offense the said defendant, Ian Anthony Roderiquez, personally inflicted great bodily injury upon Jane Doe # 3 (DOB: 05/19/2002), not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8).

* * * * *

NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5(b), the People are hereby informally requesting 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 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."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 10 COUNT(S).

Executed at San Bernardino, California, on March 24, 2011.

B. Mann

B. Mann

DECLARANT AND COMPLAINANT

Agency: SB Sheriff Homicide Division

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Ian Anthony Roderiquez	12/29/1975			