

**COPY**

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**FILED**  
YOLO SUPERIOR COURT

JAN 21 2016

*[Signature]*  
Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF YOLO

10  
11 THE PEOPLE OF THE STATE OF  
CALIFORNIA,

Dept. 1 Case No. 15007320

First Amended COMPLAINT

12  
13 Plaintiff,

14 vs.

15 JORGE ANDRES TORRES GARCIA,  
16 LANCE RICHARD ORNELLASCASTRO  
17 Defendant (s)

18  
19 I, the undersigned, say, on information and belief, that in  
20 the County of Yolo, State of California:

21 Count 1 : On or about December 11, 2015, JORGE ANDRES  
22 TORRES GARCIA and LANCE RICHARD ORNELLASCASTRO did commit a  
23 FELONY, namely, a violation of Section 187(a) of the California  
24 Penal Code, MURDER, in that JORGE ANDRES TORRES GARCIA and LANCE  
25 RICHARD ORNELLASCASTRO did willfully and unlawfully kill a  
26 human being, to wit, A.P., with malice aforethought.

27 Count Enhancement 1a : It is also alleged that the murder  
28 as charged above was committed while JORGE ANDRES TORRES GARCIA

1 was engaged in or was an accomplice in the commission of,  
2 attempted commission of, and the immediate flight after  
3 committing or attempting to commit a felony violation of Section  
4 211/212.5 of the California Penal Code, Robbery, within the  
5 meaning of Section 190.2(a)(17) of the California Penal Code,  
6 SPECIAL CIRCUMSTANCES FOR MURDER DURING THE COMMISSION OR  
7 ATTEMPTED COMMISSION OF Robbery.

8 Count Enhancement 1b : It is further alleged that during  
9 the commission or attempted commission of the felony charged  
10 above, LANCE RICHARD ORNELLASCASTRO did willfully, unlawfully,  
11 and personally use a firearm, within the meaning of Section  
12 12022.53(b) of the California Penal Code, PERSONAL USE OF  
13 FIREARM.

14 Count Enhancement 1c : It is further alleged that during  
15 the commission or attempted commission of the felony charged  
16 above JORGE ANDRES TORRES GARCIA was armed and that a principal  
17 in said felony offense was armed with a firearm, within the  
18 meaning of Section 12022(a)(1) of the California Penal Code,  
19 ARMED WITH FIREARM.

20 Count 2 : On or about December 12, 2015, JORGE ANDRES  
21 TORRES GARCIA and LANCE RICHARD ORNELLASCASTRO did commit a  
22 FELONY, namely, a violation of Section 182(a)(1) of the  
23 California Penal Code, CONSPIRACY TO COMMIT A FELONY, in that  
24 JORGE ANDRES TORRES GARCIA and LANCE RICHARD ORNELLASCASTRO did  
25 willfully and unlawfully conspire with another or others to  
26 commit a felony violation of Section 211/212.5 of the  
27 California Penal Code, and there did occur in furtherance of  
28 said conspiracy the following OVERT ACT(S): 1. Overt Act

1 Number One: Defendant and unidentified coconspirator(s)  
2 arranged to purchase marijuana from victim. 2. Overt Act  
3 Number Two: Defendant and unidentified coconspirator(s) drove  
4 to the Bel Air parking lot in Sacramento County with the intent  
5 to rob the victim of marijuana. 3. Overt Act Number Three:  
6 During the course of the robbery, defendant and the unidentified  
7 coconspirator(s) shot the victim in the head, killing him.

8 I declare under penalty of perjury that the foregoing is  
9 correct.

10 Executed on January 21, 2016, at Woodland, California.

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Robert A. Gorman/176092  
Supervising Deputy District Attorney

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