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FILED
YOLO SUPERIOR COURT

DEC 13 2021

By F. H.
Deputy

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

11 THE PEOPLE OF THE STATE OF
12 CALIFORNIA,

13 Plaintiff,

14 vs.

15 DORIAN ADAMS,
16 TAVEON THOMPSON,
17 Defendants.

Dept. 1

Case No.
CR 2021-3476
COMPLAINT

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 9, 2021, DORIAN ADAMS and
22 TAVEON THOMPSON did commit a FELONY, namely, a violation of
23 Section 490.4(a)(1) of the California Penal Code, ORGANIZED
24 RETAIL THEFT: TWO OR MORE OCCASIONS AND VALUE EXCEEDING \$950, in
25 that DORIAN ADAMS and TAVEON THOMPSON did willfully and
26 unlawfully act in concert with one or more persons to steal
27 merchandise from one or more merchant's premises or online
28 marketplace on two or more separate occasions within a 12-month

1 period, and with an aggregate value exceeding nine hundred and
2 fifty dollars (\$950), with the intent to sell and exchange and
3 return the merchandise for value.

4
5 Count 2 : On or about December 9, 2021, DORIAN ADAMS and
6 TAVEON THOMPSON did commit a FELONY, namely, a violation of
7 Section 182(a)(1) of the California Penal Code, CONSPIRACY TO
8 COMMIT A MISDEMEANOR, in that DORIAN ADAMS and TAVEON THOMPSON
9 did willfully and unlawfully conspire with another or others to
10 commit a misdemeanor violation of Section 459.5(a) of the
11 California Penal Code, and there did occur in furtherance of
12 said conspiracy the following OVERT ACT(S):

13 (1) Defendants went to the CVS in Woodland together,

14 (2) Both defendants placed items in the bags they brought
15 into the store,

16 (3) Defendants left the store with approximately \$430 of
17 stolen merchandise.

18
19 Count 3 : On or about December 9, 2021, DORIAN ADAMS and
20 TAVEON THOMPSON did commit a FELONY, namely, a violation of
21 Section 182(a)(1) of the California Penal Code, CONSPIRACY TO
22 COMMIT A MISDEMEANOR, in that DORIAN ADAMS and TAVEON THOMPSON
23 did willfully and unlawfully conspire with another or others to
24 commit a misdemeanor violation of Section 459.5(a) of the
25 California Penal Code, and there did occur in furtherance of
26 said conspiracy the following OVERT ACT(S):

27 (1) Defendants drove to the Walgreens in Woodland
28 together,

1 (2) They entered the store with Thompson carrying a bag,

2 (3) Thompson filled up the bag with merchandise with Adams
3 standing nearby,

4 (4) Adams moved her vehicle and parked directly in front of
5 Walgreens, and

6 (5) Thompson and Adams fled with approximately \$450 of
7 stolen merchandise.

8
9 Count 4 : On or about December 9, 2021, DORIAN ADAMS and
10 TAVEON THOMPSON did commit a FELONY, namely, a violation of
11 Section 182(a)(1) of the California Penal Code, CONSPIRACY TO
12 COMMIT A MISDEMEANOR, in that DORIAN ADAMS and TAVEON THOMPSON
13 did willfully and unlawfully conspire with another or others to
14 commit a misdemeanor violation of Section 459.5(a) of the
15 California Penal Code, and there did occur in furtherance of
16 said conspiracy the following OVERT ACT(S):

17 (1) Defendant drove to the CVS in Davis together,

18 (2) They entered the store each carrying an empty bag;

19 (3) They filled up the bag with approximately \$366 of
20 merchandise and left the store without paying.

21 I declare under penalty of perjury that the foregoing is
22 correct.

23 Executed on December 10, 2021, at Woodland, California.

24 *Alvina Tzang*

25
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Alvina Tzang/223325
Deputy District Attorney