

THE SUPERIOR COURT, STATE OF CALIFORNIA
For the County of Santa Barbara
Santa Maria Division

THE PEOPLE OF THE STATE OF CALIFORNIA

vs.

Plaintiff,

DA No. 16-02-375630

Court No. 1499805

**1ST AMENDED
FELONY COMPLAINT**

JOSE BONILLA MEJIA DOB: 04/15/1988
AKA: EMEDALIO BONILLA MEJIA
AKA: ESPIA
AKA: EMIDALIO BONILLA MEJIA

RAFAEL CASTRO LAINEZ DOB: 07/29/1985

OLVIN SERRANO DOB: 12/15/1985

ENEDINA TOMAS DOB: 05/19/1982

LUIS MEJIA ORELLANA DOB: 10/11/1993

JUAN CARLOS LOZANO MEMBRENO DOB: 03/08/1988

JOSE RICARDO SARAVIA LAINEZ DOB: 02/05/1992
AKA: RICARDO SARAVIA
AKA: RICARDO JOSE LAINEZ-SARADIN

JOSE BALMORE LAINEZ SARAVIA DOB: 03/31/1984

MARCOS MANUEL SANCHEZ TORRES DOB: 04/25/1994

JUAN CARLOS SERRANO URBINA DOB: 07/19/1988

MAYRA ORTEGA DOB: 08/08/1991

JOSE NARCISCO ESCOBAR HERNANDEZ DOB: 10/17/1990

JOSE JUAN TORRES SANCHEZ DOB: 06/24/1989

JOSE MEJIA ORELLANO DOB: 04/19/1992

TRANQUILINO ROBLES MORALES DOB: 04/02/1987

AKA: TRANQUILINO MORALES ROBLES DOB: 04/02/1985

AKA: TRANQUIL ROBLES MORALES DOB: 04/02/1985


EZEQUIEL ESCALANTE-RIVERA DOB: 08/03/1985

Defendants.

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY OF SANTA BARBARA

MAR 04 2016

Darrel E. Parker, Executive Officer

BY 
Maria Hurtado, Deputy Clerk

The undersigned is informed and believes that:

COUNT 1

On or between December 2, 2015 and February 12, 2016, in the County of Santa Barbara, the crime of CONSPIRACY TO COMMIT MURDER in violation of **PENAL CODE SECTION 182(a)(1)**, a Felony, was committed by JOSE BONILLA MEJIA, OLVIN SERRANO, ENEDINA TOMAS, LUIS MEJIA ORELLANA, JUAN CARLOS LOZANO MEMBRENO, JOSE RICARDO SARAVIA LAINEZ, JOSE BALMORE LAINEZ SARAVIA, MARCOS MANUEL SANCHEZ TORRES, JUAN CARLOS SERRANO URBINA, JOSE NARCISCO ESCOBAR HERNANDEZ, JOSE JUAN TORRES SANCHEZ and TRANQUILINO ROBLES MORALES, who did unlawfully conspire together and with another person and persons to commit the crime of FIRST DEGREE MURDER (VICTIM JOHN DOE #1), in violation of Section 187, of the Penal Code, a Felony and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Santa Barbara:

1. SENT PICTURES OVER FACEBOOK
2. PROVIDED INFORMATION REGARDING JOHN DOE #1'S SCHEDULE
3. CONDUCTED SURVEILLANCE OF JOHN DOE #1
4. ARMED WITH A FIREARM
5. WAITED AT JOHN DOE #1'S HOME

SPEC ALLEG - CRIMINAL STREET GANG

It is further alleged AS TO COUNTS 1 THROUGH 6 pursuant to Penal Code Section 186.22(b)(4) that the defendants, who had the specific intent to promote, further, and assist in criminal conduct by members of MS13, a criminal street gang, did unlawfully commit the crime of conspiracy to commit murder for the benefit and at the direction of and in association with said gang.

COUNT 2

On or between December 2, 2015 and February 12, 2016, in the County of Santa Barbara, the crime of CONSPIRACY TO COMMIT MURDER, in violation of **PENAL CODE SECTION 182(a)(1)**, a Felony, was committed by JOSE BONILLA MEJIA, OLVIN SERRANO, ENEDINA TOMAS, LUIS MEJIA ORELLANA, JUAN CARLOS LOZANO MEMBRENO, JOSE RICARDO SARAVIA LAINEZ, JOSE BALMORE LAINEZ SARAVIA, MARCOS MANUEL SANCHEZ TORRES, JUAN CARLOS SERRANO URBINA, JOSE NARCISCO ESCOBAR HERNANDEZ, JOSE JUAN TORRES SANCHEZ and TRANQUILINO ROBLES MORALES, who did unlawfully conspire together and with another person and persons to commit the crime of FIRST DEGREE MURDER (VICTIM JOHN DOE#2), in violation of Section 187, of the Penal Code, a Felony and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Santa Barbara:

1. SENT PICTURES OVER FACEBOOK
2. PROVIDED INFORMATION REGARDING JOHN DOE #1'S SCHEDULE
3. CONDUCTED SURVEILLANCE OF JOHN DOE #2
4. ARMED WITH A FIREARM
5. WAITED AT JOHN DOE #2'S HOME

COUNT 3

On or between February 13, 2016 and March 2, 2016, in the County of Santa Barbara, the crime of CONSPIRACY TO COMMIT MURDER, in violation of **PENAL CODE SECTION 182(a)(1)**, a Felony, was committed by LUIS MEJIA ORELLANA, JUAN CARLOS LOZANO MEMBRENO, JOSE RICARDO SARAVIA LAINEZ, JOSE BALMORE LAINEZ SARAVIA, MARCOS MANUEL SANCHEZ TORRES, JUAN CARLOS SERRANO URBINA, JOSE NARCISCO ESCOBAR HERNANDEZ, JOSE MEJIA ORELLANO and TRANQUILINO ROBLES MORALES, who did unlawfully conspire together and with another person to commit the crime of FIRST DEGREE MURDER (VICTIM JOHN DOE #3), in violation of Section 187, of the Penal Code, a Felony and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Santa Barbara:

1. PURCHASED GUN
2. PROVIDED GUN
3. ARMED WITH GUN
4. DROVE TO OXNARD FROM SANTA MARIA

COUNT 4

On or between February 13, 2016 and March 2, 2016, in the County of Santa Barbara, the crime of CONSPIRACY TO COMMIT MURDER, in violation of **PENAL CODE SECTION 182(a)(1)**, a Felony, was committed by LUIS MEJIA ORELLANA, JUAN CARLOS LOZANO MEMBRENO, JOSE RICARDO SARAVIA LAINEZ, JOSE BALMORE LAINEZ SARAVIA, MARCOS MANUEL SANCHEZ TORRES, JUAN CARLOS SERRANO URBINA, JOSE NARCISCO ESCOBAR HERNANDEZ, JOSE MEJIA ORELLANO and TRANQUILINO ROBLES MORALES, who did unlawfully conspire together and with another person to commit the crime of FIRST DEGREE MURDER (VICTIM JOHN DOE #4), in violation of Section 187, of the Penal Code, a Felony and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Santa Barbara:

1. PURCHASED GUN
2. PROVIDED GUN
3. ARMED WITH GUN
4. DROVE TO OXNARD FROM SANTA MARIA

COUNT 5

On or between February 13, 2016 and March 2, 2016, in the County of Santa Barbara, the crime of CONSPIRACY TO COMMIT MURDER, in violation of **PENAL CODE SECTION 182(a)(1)**, a Felony, was committed by LUIS MEJIA ORELLANA, JUAN CARLOS LOZANO MEMBRENO, JOSE RICARDO SARAVIA LAINEZ, JOSE BALMORE LAINEZ SARAVIA, MARCOS MANUEL SANCHEZ TORRES, JUAN CARLOS SERRANO URBINA, JOSE NARCISCO ESCOBAR HERNANDEZ, JOSE MEJIA ORELLANO and TRANQUILINO ROBLES MORALES, who did unlawfully conspire together and with another person to commit the crime of FIRST DEGREE MURDER (VICTIM JOHN DOE #5), in violation of Section 187, of the Penal Code, a Felony and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Santa Barbara:

1. PURCHASED GUN
2. PROVIDED GUN
3. ARMED WITH GUN
4. DROVE TO OXNARD FROM SANTA MARIA

COUNT 6

On or between February 13, 2016 and March 2, 2016, in the County of Santa Barbara, the crime of CONSPIRACY TO COMMIT MURDER, in violation of **PENAL CODE SECTION 182(a)(1)**, a Felony, was committed by LUIS MEJIA ORELLANA, JUAN CARLOS LOZANO MEMBRENO, JOSE RICARDO SARAVIA LAINEZ, JOSE BALMORE LAINEZ SARAVIA, MARCOS MANUEL SANCHEZ TORRES, JUAN CARLOS SERRANO URBINA, JOSE NARCISCO ESCOBAR HERNANDEZ, JOSE MEJIA ORELLANO and TRANQUILINO ROBLES MORALES, who did unlawfully conspire together and with another person to commit the crime of FIRST DEGREE MURDER (VICTIM JOHN DOE #6), in violation of Section 187, of the Penal Code, a Felony and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Santa Barbara:

1. PURCHASED GUN
2. PROVIDED GUN
3. ARMED WITH GUN
4. DROVE TO OXNARD FROM SANTA MARIA

COUNT 7

On or between December 1, 2015 and March 2, 2016, in the County of Santa Barbara, the crime of CRIMINAL STREET GANG CONSPIRACY, in violation of **PENAL CODE SECTION 182.5**, a Felony, was committed by JOSE BONILLA MEJIA, RAFAEL CASTRO LAINEZ, OLVIN SERRANO, LUIS MEJIA ORELLANA, JUAN CARLOS LOZANO MEMBRENO, JOSE RICARDO SARAVIA LAINEZ, JOSE BALMORE LAINEZ SARAVIA, MARCOS MANUEL SANCHEZ TORRES, JUAN CARLOS SERRANO URBINA, JOSE NARCISCO ESCOBAR HERNANDEZ, JOSE MEJIA ORELLANO, EZEQUIEL ESCALANTE-RIVERA and TRANQUILINO ROBLES MORALES, did unlawfully and actively participate in a criminal street gang with knowledge that its members engage in and have engaged in a pattern of street gang activity and did willfully promote, further, assist and benefit from felonious criminal conduct by members of that street gang.

COUNT 8

On or between February 1, 2016 and March 2, 2016, in the County of Santa Barbara, the crime of CONSPIRACY TO COMMIT STREET TERRORISM, in violation of **PENAL CODE SECTION 182(a)(1)**, a Felony, was committed by RAFAEL CASTRO LAINEZ, JOSE RICARDO SARAVIA LAINEZ, JOSE MEJIA ORELLANO and EZEQUIEL ESCALANTE-RIVERA, who did unlawfully conspire together and with another person to commit the crime of ACTIVE PARTICIPANT IN A CRIMINAL STREET GANG, in violation of Section 186.22(a), of the Penal Code, a Felony, and for the purposes of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Santa Barbara:

1. TOOK MONEY
2. DROVE TO BAKERSFIELD FROM SANTA MARIA

3. PROVIDED GUN
4. DROVE TO OXNARD FROM SANTA MARIA

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) (28)."

COUNT 9

On or about March 3, 2016, in the County of Santa Barbara, the crime of HAVING CONCEALED FIREARM ON PERSON, in violation of **PENAL CODE SECTION 25400(a)**, a Felony, was committed by MAYRA ORTEGA, who did unlawfully carry concealed on her person which was under his/her control and direction a pistol, revolver, and firearm capable of being concealed upon the person.

SPEC ALLEG-GANG CRIME PENALTY ENHANCEMENT

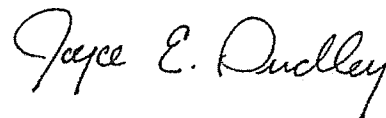
It is further alleged pursuant to Penal Code Section 186.22(d) the above offense is a felony in that it was committed for the benefit of, at the direction of and in association with a criminal street gang, to wit: MS13, with the specific intent to promote, further and assist in criminal conduct by gang members.

* * * * *

Pursuant to penal code section 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.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 8 COUNT(S).

Executed at Santa Maria, California, on March 4, 2016.



ANN BRAMSEN
SENIOR DEPUTY DISTRICT ATTORNEY

Agency: SMPD

<u>DEFENDANT NAME</u>	<u>SEX</u>	<u>RACE</u>	<u>HGT</u>	<u>WGT</u>	<u>EYES</u>	<u>HAIR</u>	<u>DRIVER'S LICENSE</u>	<u>COURT STS</u>	<u>COURT DATE</u>
Jose Bonilla Mejia	M	H						IC	
Rafael Castro Lainez	M	H	508	160	BRO	BLK	D3301013	IC	03/04/2016
Olvin Serrano	M	H						IC	03/04/2016
Enedina Tomas	F	H						IC	03/04/2016
Luis Mejia Orellana	M	H						IC	03/04/2016
Juan Carlos Lozano Membreno	M	H						IC	03/04/2016
Jose Ricardo Saravia Lainez	M	H	507	160	BRO	BLK		IC	03/04/2016
Jose Balmore Lainez Saravia	M	H	506	180	BRO	BLK	X3193624	IC	03/04/2016
Marcos Manuel Sanchez Torres	M	H						IC	03/04/2016
Juan Carlos Serrano Urbina	M	H	511	160	BRO	BRO		IC	03/04/2016

Mayra Ortega	F	H							IC	03/04/2016
Jose Narcisco Escobar Hernandez	M	H							IC	03/04/2016
Jose Juan Torres Sanchez	M	H							IC	03/04/2016
Jose Mejia Orellano	M	H								
Tranquilino Robles Morales	M	H	506	170	BRO	BLK	X7456744	IC	03/04/2016	
Ezequiel Escalante-Rivera	M	H								

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