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8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN

9 Stockton Branch

10 The People of the State of California,  
11 Plaintiff,

No. SP14-26068  
SPD CASE  
DA Case: CR-2014-4078139

12 v.

13 COMPLAINT

14 JAIME RAMOS

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18 Defendant(s).

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

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22 **COUNT 1: WILLEFUL, DELIBERATE, PREMEDITATED MURDER PC.187(A)<F22**

23 On or about July 16, 2014, in the County of San Joaquin,  
24 California, JAIME RAMOS, did commit the crime of WILLFUL,  
25 DELIBERATE, PREMEDITATED MURDER, in violation of Section 187(a) of  
26 the Penal Code, a FELONY, who at the time and place last aforesaid  
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1 did willfully, unlawfully, and with malice aforethought murder  
2 MISTY HOLT-SINGH a human being. It is further alleged that the  
3 aforesaid murder was committed willfully, deliberately and with  
4 premeditation within the meaning of Penal Code Section 189 and is a  
5 serious felony pursuant to Penal Code Section 1192.7(c).

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7 **SPECIAL CIRCUMSTANCE: MULTIPLE MURDERS PC.190.2(A)(3)**

8 It is further alleged that the offense charged in counts ONE, are a  
9 special circumstance, within the meaning of Penal Code Section  
10 190.2(a)(3).

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13 **SPECIAL CIRCUMSTANCE: ROBBERY PC.190.2(A)(17)(A)**

14 It is further alleged that the murder of MISTY HOLT-SINGH was  
15 COMMITTED by defendant, JAIME RAMOS , while the said defendant  
16 ENGAGED IN THE COMMISSION OF the crime of ROBBERY, within the  
17 meaning of Penal Code Section 190.2(a)(17)(a).

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19 **SPECIAL CIRCUMSTANCE: KIDNAPPING PC.190.2(A)(17)(B)**

20 It is further alleged that the murder of MISTY HOLT-SINGH was  
21 committed by defendant, JAIME RAMOS , while the said defendant was  
22 engaged in the commission of the crime of Kidnapping in violation  
23 of Penal Code Section 207 and 209.  
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1 **SPECIAL CIRCUMSTANCE: BURGLARY MURDER PC.190.2 (A) (17) (G)**

2 It is further alleged that the murder of MISTY HOLT-SINGH was  
3 COMMITTED by defendant, JAIME RAMOS , while the said defendant  
4 ENGAGED IN THE COMMISSION OF the crime of BURGLARY, within the  
5 meaning of Penal Code Section 190.2(a)(17)(g).  
6

7 **SPECIAL CIRCUMSTANCE: MURDER COMMITTED CRIMINAL STREET GANG**  
8 **PC.190.2 (A) (22)**

9 It is further alleged, pursuant to Penal Code Section 190.2(a)(22),  
10 that the defendant, JAIME RAMOS , intentionally killed MISTY HOLT-  
11 SINGH while the defendant was an active participant in a criminal  
12 street gang, and that the murder was carried out to further the  
13 activities of the criminal street gang.  
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15 **PRINCIPAL'S INTENTIONAL DISCHARGE OF A FIREARM, GBI-GANG CASE**  
16 **PC.12022.53 (D) (E) (1)**

17 As to defendant JAIME RAMOS it is further alleged that in the  
18 commission of the foregoing offense, a principal intentionally and  
19 personally discharged a firearm, to wit: SEMI-AUTOMATIC FIREARM,  
20 and proximately caused great bodily injury as defined in Penal Code  
21 Section 12022.7, or death, to a person other than an accomplice, to  
22 wit: MISTY HOLT-SINGH within the meaning of Sections 12022.53(d)  
23 and (e)(1) (and 12022.53(c) and 12022.53(b) of the Penal Code.  
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1 **CRIMINAL STREET GANG ACTIVITY PC.186.22(B) (1)**

2 It is further alleged that pursuant to Penal Code Section  
3 186.22(b)(1) that the above offense was committed by JAIME RAMOS  
4 for the benefit of, at the direction of, or in association with a  
5 criminal street gang, and with the specific intent to promote,  
6 further, or assist in criminal conduct by gang members.  
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8  
9 For a further and separate cause of complaint, being a different  
10 offense from but connected in its commission with the charge(s)  
11 above, complainant further complains and says:  
12

13 **COUNT 2: WILLFUL, DELIBERATE, PREMEDITATED MURDER PC.187(A)<F22**

14 On or about July 16, 2014, in the County of San Joaquin,  
15 California, JAIME RAMOS, did commit the crime of WILLFUL,  
16 DELIBERATE, PREMEDITATED MURDER, in violation of Section 187(a) of  
17 the Penal Code, a FELONY, who at the time and place last aforesaid  
18 did willfully, unlawfully, and with malice aforethought murder ALEX  
19 MARTINEZ a human being. It is further alleged that the aforesaid  
20 murder was committed willfully, deliberately and with premeditation  
21 within the meaning of Penal Code Section 189 and is a serious  
22 felony pursuant to Penal Code Section 1192.7(c).  
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1 **SPECIAL CIRCUMSTANCE: MULTIPLE MURDERS PC.190.2 (A) (3)**

2 It is further alleged that the offense charged in counts TWO, are a  
3 special circumstance, within the meaning of Penal Code Section  
4 190.2(a)(3).

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6 **SPECIAL CIRCUMSTANCE: ROBBERY PC.190.2 (A) (17) (A)**

7 It is further alleged that the murder of ALEX MARTINEZ was  
8 COMMITTED by defendant, JAIME RAMOS , while the said defendant  
9 ENGAGED IN THE COMMISSION OF the crime of ROBBERY, within the  
10 meaning of Penal Code Section 190.2(a)(17)(a).

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13 **SPECIAL CIRCUMSTANCE: KIDNAPPING PC.190.2 (A) (17) (B)**

14 It is further alleged that the murder of ALEX MARTINEZ was  
15 committed by defendant, JAIME RAMOS , while the said defendant was  
16 engaged in the commission of the crime of Kidnapping in violation  
17 of Penal Code Section 207 and 209.

18  
19 **SPECIAL CIRCUMSTANCE: BURGLARY MURDER PC.190.2 (A) (17) (G)**

20 It is further alleged that the murder of ALEX MARTINEZ was  
21 COMMITTED by defendant, JAIME RAMOS, while the said defendant  
22 ENGAGED IN THE COMMISSION OF the crime of BURGLARY, within the  
23 meaning of Penal Code Section 190.2(a)(17)(g).

1 **SPECIAL CIRCUMSTANCE: MURDER COMMITTED CRIMINAL STREET GANG**  
2 **PC.190.2 (A) (22)**

3 It is further alleged, pursuant to Penal Code Section 190.2(a)(22),  
4 that the defendant, JAIME RAMOS , intentionally killed ALEX  
5 MARTINEZ while the defendant was an active participant in a  
6 criminal street gang, and that the murder was carried out to  
7 further the activities of the criminal street gang.

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9 **PRINCIPAL'S INTENTIONAL DISCHARGE OF A FIREARM, GBI-GANG CASE**  
10 **PC.12022.53 (D) (E) (1)**

11 As to defendant JAIME RAMOS it is further alleged that in the  
12 commission of the foregoing offense, a principal intentionally and  
13 personally discharged a firearm, to wit: SEMI- AUTOMATIC FIREARM,  
14 and proximately caused great bodily injury as defined in Penal Code  
15 Section 12022.7, or death, to a person other than an accomplice, to  
16 wit: ALEX MARTINEZ within the meaning of Sections 12022.53(d) and  
17 (e)(1) (and 12022.53(c) and 12022.53(b) of the Penal Code.

18  
19 **CRIMINAL STREET GANG ACTIVITY PC.186.22 (B) (1)**

20 It is further alleged that pursuant to Penal Code Section  
21 186.22(b)(1) that the above offense was committed by JAIME RAMOS  
22 for the benefit of, at the direction of, or in association with a  
23 criminal street gang, and with the specific intent to promote,  
24 further, or assist in criminal conduct by gang members.  
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1 For a further and separate cause of complaint, being a different  
2 offense from but connected in its commission with the charge(s)  
3 above, complainant further complains and says:  
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5 **COUNT 3: WILLFUL, DELIBERATE, PREMEDITATED MURDER PC.187(A)<F22**

6 On or about July 16, 2014, in the County of San Joaquin,  
7 California, JAIME RAMOS, did commit the crime of WILLFUL,  
8 DELIBERATE, PREMEDITATED MURDER, in violation of Section 187(a) of  
9 the Penal Code, a FELONY, who at the time and place last aforesaid  
10 did willfully, unlawfully, and with malice aforethought murder  
11 GILBERT RENTERIA a human being. It is further alleged that the  
12 aforesaid murder was committed willfully, deliberately and with  
13 premeditation within the meaning of Penal Code Section 189 and is a  
14 serious felony pursuant to Penal Code Section 1192.7(c).  
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16  
17 **SPECIAL CIRCUMSTANCE: MULTIPLE MURDERS PC.190.2(A)(3)**

18 It is further alleged that the offense charged in counts THREE, are  
19 a special circumstance, within the meaning of Penal Code Section  
20 190.2(a)(3).  
21

22 **SPECIAL CIRCUMSTANCE: ROBBERY PC.190.2(A)(17)(A)**

23 It is further alleged that the murder of GILBERT RENTERIA was  
24 COMMITTED by defendant, JAIME RAMOS , while the said defendant  
25 ENGAGED IN THE COMMISSION OF the crime of ROBBERY, within the  
26 meaning of Penal Code Section 190.2(a)(17)(a).  
27

1 **SPECIAL CIRCUMSTANCE: KIDNAPPING PC.190.2 (A) (17) (B)**

2 It is further alleged that the murder of GILBERT RENTERIA was  
3 committed by defendant, JAIME RAMOS , while the said defendant was  
4 engaged in the commission of the crime of Kidnapping in violation  
5 of Penal Code Section 207 and 209.  
6

7 **SPECIAL CIRCUMSTANCE: BURGLARY MURDER PC.190.2 (A) (17) (G)**

8 It is further alleged that the murder of GILBERT RENTERIA was  
9 COMMITTED by defendant, JAIME RAMOS , while the said defendant  
10 ENGAGED IN THE COMMISSION OF the crime of BURGLARY,  
11 within the meaning of Penal Code Section 190.2(a)(17)(g).  
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14 **SPECIAL CIRCUMSTANCE: MURDER COMMITTED CRIMINAL STREET GANG  
PC.190.2 (A) (22)**

15 It is further alleged, pursuant to Penal Code Section 190.2(a)(22),  
16 that the defendant, JAIME RAMOS , intentionally killed GILBERT  
17 RENTERIA while the defendant was an active participant in a  
18 criminal street gang, and that the murder was carried out to  
19 further the activities of the criminal street gang.  
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22 **PRINCIPAL'S INTENTIONAL DISCHARGE OF A FIREARM, GBI-GANG CASE  
PC.12022.53 (D) (E) (1)**

23 As to defendant JAIME RAMOS it is further alleged that in the  
24 commission of the foregoing offense, a principal intentionally and  
25 personally discharged a firearm, to wit: SEMI-AUTOMATIC FIREARM and  
26 proximately caused great bodily injury as defined in Penal Code  
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1 Section 12022.7, or death, to a person other than an accomplice, to  
2 wit: GILBERT RENTERIA within the meaning of Sections 12022.53(d)  
3 and (e)(1) (and 12022.53(c) and 12022.53(b) of the Penal Code.  
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5 **CRIMINAL STREET GANG ACTIVITY PC.186.22(B)(1)**

6 It is further alleged that pursuant to Penal Code Section  
7 186.22(b)(1) that the above offense was committed by JAIME RAMOS  
8 for the benefit of, at the direction of, or in association with a  
9 criminal street gang, and with the specific intent to promote,  
10 further, or assist in criminal conduct by gang members.  
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12  
13 For a further and separate cause of complaint, being a different  
14 offense from but connected in its commission with the charge(s)  
15 above, complainant further complains and says:  
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17 **COUNT 4: ROBBERY PC.211**

18 On or about July 16, 2014, in the County of San Joaquin,  
19 California, JAIME RAMOS, did commit the crime of FIRST DEGREE  
20 ROBBERY, in violation of Section 211 of the Penal Code, a FELONY,  
21 who at the time and place last aforesaid, did willfully,  
22 unlawfully, and by means of force and fear take personal property  
23 from the person, possession, and immediate presence of BANK OF THE  
24 WEST. It is further alleged that the above offense is a serious  
25 felony within the meaning of Penal Code Section 1192.7(c)(19).  
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1 **PRINCIPAL'S INTENTIONAL DISCHARGE OF A FIREARM, GBI-GANG CASE**  
2 **PC.12022.53(D) (E) (1)**

3 As to defendant JAIME RAMOS it is further alleged that in the  
4 commission of the foregoing offense, a principal intentionally and  
5 personally discharged a firearm, to wit: SEMI-AUTOMATIC FIREARM,  
6 and proximately caused great bodily injury as defined in Penal Code  
7 Section 12022.7, or death, to a person other than an accomplice, to  
8 wit: BANK OF THE WEST, within the meaning of Sections 12022.53(d)  
9 and (e) (1) (and 12022.53(c) and 12022.53(b) of the Penal Code.  
10

11 **USE OF FIREARM IN COMMISSION OF FELONY PC.12022.5(A)<F1**

12 It is further alleged that in the commission and attempted  
13 commission of the above offense, the said defendant JAIME RAMOS  
14 personally used firearm(s), within the meaning of Penal Code  
15 Section 1203.06(a) (1) and 12022.5(a) and also causing the above to  
16 become a serious felony pursuant to Penal Code Section  
17 1192.7(c) (8).  
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19  
20 **CRIMINAL STREET GANG ACTIVITY PC.186.22(B) (1)**

21 It is further alleged that pursuant to Penal Code Section  
22 186.22(b) (1) that the above offense was committed by JAIME RAMOS  
23 for the benefit of, at the direction of, or in association with a  
24 criminal street gang, and with the specific intent to promote,  
25 further, or assist in criminal conduct by gang members.  
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1 For a further and separate cause of complaint, being a different  
2 offense from but connected in its commission with the charge(s)  
3 above, complainant further complains and says:  
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5 **COUNT 5: KIDNAPPING TO COMMIT ROBBERY, RAPE, SODOMY, ETC. PC. 209(B) (1)**

6 On or about July 16, 2014, in the County of San Joaquin,  
7 California, JAIME RAMOS, did commit the crime of KIDNAPPING TO  
8 COMMIT ANOTHER CRIME, in violation of Section 209(b) (1) of the  
9 Penal Code, a FELONY, who at the time and place last aforesaid, did  
10 willfully and unlawfully kidnap and carry away KELLY HUBER to  
11 commit ROBBERY. It is further alleged that the above offense is a  
12 serious FELONY within the meaning of Penal Code Section  
13 1192.7(c) (20).  
14

15  
16 **PRINCIPAL'S INTENTIONAL DISCHARGE OF A FIREARM, GBI-GANG CASE  
17 PC. 12022.53 (D) (E) (1)**

18 As to defendant JAIME RAMOS it is further alleged that in the  
19 commission of the foregoing offense, a principal intentionally and  
20 personally discharged a firearm, to wit: SEMI-AUTOMATIC FIREARM,  
21 and proximately caused great bodily injury as defined in Penal Code  
22 Section 12022.7, or death, to a person other than an accomplice, to  
23 wit: KELLY HUBER within the meaning of Sections 12022.53(d) and  
24 (e) (1) (and 12022.53(c) and 12022.53(b) of the Penal Code.  
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1 **USE OF FIREARM IN COMMISSION OF FELONY PC.12022.5(A)<F1**

2 It is further alleged that in the commission and attempted  
3 commission of the above offense, the said defendant JAIME RAMOS  
4 personally used firearm(s), within the meaning of Penal Code  
5 Section 1203.06(a)(1) and 12022.5(a) and also causing the above to  
6 become a serious felony pursuant to Penal Code Section  
7 1192.7(c)(8).

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10 **CRIMINAL STREET GANG ACTIVITY PC.186.22(B)(1)**

11 It is further alleged that pursuant to Penal Code Section  
12 186.22(b)(1) that the above offense was committed by JAIME RAMOS  
13 for the benefit of, at the direction of, or in association with a  
14 criminal street gang, and with the specific intent to promote,  
15 further, or assist in criminal conduct by gang members.

16  
17 For a further and separate cause of complaint, being a different  
18 offense from but connected in its commission with the charge(s)  
19 above, complainant further complains and says:

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21 **COUNT 6: ATTEMPTED MURDER:PREMEDITATED PC.664/187(A)**

22 On or about July 16, 2014, in the County of San Joaquin,  
23 California, JAIME RAMOS, did commit the crime of ATTEMPTED WILLFUL,  
24 DELIBERATE, PREMEDITATED MURDER, in violation of Section 664/187(a)  
25 of the Penal Code, a FELONY, who at the time and place last  
26 aforesaid, did willfully, unlawfully, deliberately, with  
27

1 premeditation and malice aforethought, attempt to murder, KELLY  
2 HUBER A HUMAN BEING.

3  
4 **PRINCIPAL'S INTENTIONAL DISCHARGE OF A FIREARM, GBI-GANG CASE**  
5 **PC.12022.53(D) (E) (1)**

6 As to defendant JAIME RAMOS it is further alleged that in the  
7 commission of the foregoing offense, a principal intentionally and  
8 personally discharged a firearm, to wit: SEMI-AUTOMATIC FIREARM and  
9 proximately caused great bodily injury as defined in Penal Code  
10 Section 12022.7, or death, to a person other than an accomplice, to  
11 wit: KELLY HUBER within the meaning of Sections 12022.53(d) and  
12 (e) (1) (and 12022.53(c) and 12022.53(b) of the Penal Code.

13  
14 **CRIMINAL STREET GANG ACTIVITY PC.186.22(B) (1)**

15 It is further alleged that pursuant to Penal Code Section  
16 186.22(b) (1) that the above offense was committed by JAIME RAMOS  
17 for the benefit of, at the direction of, or in association with a  
18 criminal street gang, and with the specific intent to promote,  
19 further, or assist in criminal conduct by gang members.

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21  
22 For a further and separate cause of complaint, being a different  
23 offense from but connected in its commission with the charge(s)  
24 above, complainant further complains and says: