

1 TORI VERBER SALAZAR
2 District Attorney, County of San Joaquin
3 State Bar Number 213636
4 By: Robert Himelblau, SBN 142591
5 Chief Deputy District Attorney
6 222 E. Weber Avenue, First Floor, Room 101,
7 P.O. Box 990
8 Stockton, California 95201

9 Telephone: (209) 468-2400

10 Attorneys for Plaintiff

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN JOAQUIN
12 STOCKTON BRANCH

13 THE PEOPLE OF THE STATE OF CALIFORNIA,

14 Plaintiff,

15 vs.

16 WESLEY BROWNLEE,

17 Defendant(s).

No. SP22-32459, SP22-28891,
SP22-31727
STOCKTON POLICE
DEPARTMENT CASE
DA Case: 0928095

Complaint No:
202210180034

AMENDED COMPLAINT

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

20 **COUNT 1: Code Section PC 187(A) MURDER**

21 On or about August 30, 2022 in the County of San Joaquin, California, WESLEY
22 BROWNLEE did commit the crime of MURDER, in violation of Section 187(a) of the Penal
23 Code, a FELONY, who at the time and place last aforesaid, did willfully and unlawfully and
24 intentionally and with malice aforethought murder JONATHAN RODRIGUEZ
25 HERNANDEZ, a human being. It is further alleged that the above offense is a serious felony
26 within the meaning of Penal Code Section 1192.7(c)(1).
27
28

1 **INTENTIONAL DISCHARGE OF A FIREARM GBI/DEATH PC12022.53(D)**

2 It is further alleged that WESLEY BROWNLEE personally and intentionally discharged a
3 firearm, to-wit: HANDGUN which proximately caused great bodily injury and death to
4 JONATHAN RODRIGUEZ HERNANDEZ within the meaning of Penal Code Section
5 12022.53(D).

6
7 **USE OF FIREARM IN COMMISSION OF FELONY PC12022.5(A)**

8 It is further alleged that in the commission and attempted commission of the above offense, the
9 said defendant WESLEY BROWNLEE personally used firearm(s), within the meaning of
10 Penal Code Section 1203.06(a)(1) and 12022.5(a) and also causing the above to become a
11 serious felony pursuant to Penal Code Section 1192.7(c)(8).

12
13 **SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE MURDERS**

14 **PC190.2(A)(3)**

15 It is further alleged that defendant, WESLEY BROWNLEE, in this proceeding, has been
16 convicted of more than one offense of murder in the first or second degree.

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

20
21 **COUNT 2: Code Section PC 187(A) MURDER**

22 On or about September 21, 2022 in the County of San Joaquin, California, WESLEY
23 BROWNLEE did commit the crime of MURDER, in violation of Section 187(a) of the Penal
24 Code, a FELONY, who at the time and place last aforesaid, did willfully and unlawfully and
25 intentionally and with malice aforethought murder JUAN CARLOS CARRANZA-CRUZ, a
26 human being. It is further alleged that the above offense is a serious felony within the meaning
27 of Penal Code Section 1192.7(c)(1).

1 **INTENTIONAL DISCHARGE OF A FIREARM GBI/DEATH PC12022.53(D)**

2 It is further alleged that WESLEY BROWNLEE personally and intentionally discharged a
3 firearm, to-wit: HANDGUN which proximately caused great bodily injury and death to JUAN
4 CARLOS CARRANZA-CRUZ within the meaning of Penal Code Section 12022.53(D)..

5
6 **USE OF FIREARM IN COMMISSION OF FELONY PC12022.5(A)**

7 It is further alleged that in the commission and attempted commission of the above offense, the
8 said defendant WESLEY BROWNLEE personally used firearm(s), within the meaning of
9 Penal Code Section 1203.06(a)(1) and 12022.5(a) and also causing the above to become a
10 serious felony pursuant to Penal Code Section 1192.7(c)(8).

11
12 **SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE MURDERS**

13 **PC190.2(A)(3)**

14 It is further alleged that defendant, WESLEY BROWNLEE, in this proceeding, has been
15 convicted of more than one offense of murder in the first or second degree.

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

19
20 **COUNT 3: Code Section PC 187(A) MURDER**

21 On or about September 27, 2022 in the County of San Joaquin, California, WESLEY
22 BROWNLEE did commit the crime of MURDER, in violation of Section 187(a) of the Penal
23 Code, a FELONY, who at the time and place last aforesaid, did willfully and unlawfully and
24 intentionally and with malice aforethought murder LAWRENCE LOPEZ, a human being. It is
25 further alleged that the above offense is a serious felony within the meaning of Penal Code
26 Section 1192.7(c)(1).

1 **INTENTIONAL DISCHARGE OF A FIREARM GBI/DEATH PC12022.53(D)**

2 It is further alleged that WESLEY BROWNLEE personally and intentionally discharged a
3 firearm, to-wit: HANDGUN which proximately caused great bodily injury and death to
4 LAWRENCE LOPEZ within the meaning of Penal Code Section 12022.53(D).

5
6 **USE OF FIREARM IN COMMISSION OF FELONY PC12022.5(A)**

7 It is further alleged that in the commission and attempted commission of the above offense, the
8 said defendant WESLEY BROWNLEE personally used firearm(s), within the meaning of
9 Penal Code Section 1203.06(a)(1) and 12022.5(a) and also causing the above to become a
10 serious felony pursuant to Penal Code Section 1192.7(c)(8).

11
12 **SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE MURDERS**

13 **PC190.2(A)(3)**

14 It is further alleged that defendant, WESLEY BROWNLEE, in this proceeding, has been
15 convicted of more than one offense of murder in the first or second degree.

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

19
20 **COUNT 4: Code Section PC 29800(A)(1) FELON/ADDICT POSSESS/ETC FIREARM**

21 On or about October 14, 2022 in the County of San Joaquin, California, WESLEY
22 BROWNLEE did commit the crime of FELON/ADDICT POSSESS/ETC FIREARM, in
23 violation of Section 29800(a)(1) of the Penal Code, a FELONY, who at the time and place last
24 aforesaid, did willfully and unlawfully own, purchase, receive or have in his possession or
25 under his custody or control a firearm, to-wit: HANDGUN, and said defendant WESLEY
26 BROWNLEE 1. having theretofore been duly and legally convicted of a felony or felonies, to-
27 wit: the crime of POSSESSION OF COCAINE BASE FOR SALE in violation of Section

1 11351.5 of the HEALTH AND SAFETY Code on MARCH 2, 2015 by and before the
2 SUPERIOR Court, County of San Joaquin State of California.

3
4 For a further and separate cause of complaint, being a different offense from but connected in
5 its commission with the charge(s) above, complainant further complains and says:

6
7 **COUNT 5: Code Section PC 30305(A)(1) POSSESSION OF AMMUNITION**

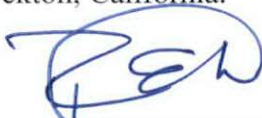
8 On or about October 14, 2022 in the County of San Joaquin, California, WESLEY
9 BROWNLEE did commit the crime of POSSESSION OF AMMUNITION, in violation of
10 Section 30305(a)(1) of the Penal Code, a FELONY, who at the time and place last aforesaid,
11 did unlawfully sell, own, possess and have under control ammuniton and reloaded
12 ammuniton. It is further alleged that the defendant is prohibited from owning or possessing a
13 firearm pursuant to sections 29800 et. seq. and 29900 et. seq. of the Penal Code and sections
14 8100 and 8103 of the Welfare and Institutions Code, having been previously convicted of the
15 following offense(s): POSSESSION OF COCAINE BASE FOR SALE, in violation of Section
16 11351.5 of the HEALTH AND SAFETY Code on MARCH 2, 2015 by and before the Superior
17 Court, County of San Joaquin, Court Case # CR-2017-0007888.

18
19 If the above-named defendant(s) is/are presently on probation in San Joaquin County, any
20 evidence presented at a preliminary hearing in the instant case will be used not only as a basis
21 for a holding order in this case but also as evidence of a violation of probation and, at any
22 formal hearing on that violation of probation, the People will move the transcript of the
23 preliminary hearing into evidence as a basis for the violation.

24
25 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that the
26 defendant and their attorney disclose to the People all information and materials described in
27 Penal Code Section 1054.3.

1 I declare under penalty of perjury that the foregoing is true and correct except for those things
2 stated on information and belief and those I believe to be true.

3
4 Executed on October 17, 2022, at Stockton, California.



5
6 ROBERT HIMELBLAU
Chief Deputy District Attorney

7 RH/rds

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28