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7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN JOAQUIN

9 Stockton Branch

10
11 THE PEOPLE OF THE STATE OF CALIFORNIA,

12 Plaintiff,

13 vs.

14 WESLEY BROWNLEE,
CR-2022-0010220

15 Defendant(s).

No. SP22-32459, SP21-13287, SP22-
22245, SP22-26611, SP22-28891,
SP22-31727, OAK21-16247,
OAK21-17284
SPD CASE
DA Case: 0928095

Complaint No: 202210180034

2nd AMENDED COMPLAINT

16
17 I, the undersigned, say, on information and belief, that in the County of SAN JOAQUIN, State
18 of California:

19
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
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28

1 within the meaning of Penal Code Section 1192.7(c)(1).

2
3 **INTENTIONAL DISCHARGE OF A FIREARM GBI/DEATH PC12022.53(D)**

4 It is further alleged that WESLEY BROWNLEE personally and intentionally discharged a
5 firearm, to-wit: A HANDGUN, which proximately caused great bodily injury and death to
6 JONATHAN RODRIGUEZ HERNANDEZ within the meaning of Penal Code Section
7 12022.53(D).

8
9 **USE OF FIREARM IN COMMISSION OF FELONY PC12022.5(A)**

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

14
15 **PC190.2(a)(3) - SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE**
16 **MURDERS**

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

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

22
23 **COUNT 2: Code Section PC 187(A) MURDER**

24 On or about September 21, 2022 in the County of San Joaquin, California, WESLEY
25 BROWNLEE did commit the crime of MURDER, in violation of Section 187(a) of the Penal
26 Code, a FELONY, who at the time and place last aforesaid, did willfully and unlawfully and
27 intentionally and with malice aforethought murder JUAN CARLOS CARRANZA-CRUZ, a
28

1 human being. It is further alleged that the above offense is a serious felony within the meaning
2 of Penal Code Section 1192.7(c)(1).

3
4 **INTENTIONAL DISCHARGE OF A FIREARM GBI/DEATH PC12022.53(D)**

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

8
9 **USE OF FIREARM IN COMMISSION OF FELONY PC12022.5(A)**

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

14
15 **PC190.2(a)(3) - SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE**
16 **MURDERS**

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

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

22
23 **COUNT 3: Code Section PC 187(A) MURDER**

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

3
4 **INTENTIONAL DISCHARGE OF A FIREARM GBI/DEATH PC12022.53(D)**

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

8
9 **USE OF FIREARM IN COMMISSION OF FELONY PC12022.5(A)**

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

14
15 **PC190.2(a)(3) - SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE**
16 **MURDERS**

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

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

22
23 **COUNT 4: Code Section PC 29800(A)(1) FELON/ADDICT POSSESS/ETC FIREARM**

24 On or about October 14, 2022 in the County of San Joaquin, California, WESLEY
25 BROWNLEE did commit the crime of FELON/ADDICT POSSESS/ETC FIREARM, in
26 violation of Section 29800(a)(1) of the Penal Code, a FELONY, who at the time and place last
27 aforesaid, did willfully and unlawfully own, purchase, receive or have in his possession or
28

1 under his custody or control a firearm, to-wit: A HANDGUN, and said defendant WESLEY
2 BROWNLEE having theretofore been duly and legally convicted of a felony or felonies, to-
3 wit: the crime of POSSESSION OF COCAINE BASE FOR SALE in violation of Section
4 11351.5 of the HEALTH AND SAFETY Code on MARCH 2, 2015 by and before the
5 SUPERIOR Court, County of San Joaquin State of California.

6
7 For a further and separate cause of complaint, being a different offense from but connected in
8 its commission with the charge(s) above, complainant further complains and says:

9
10 **COUNT 5: Code Section PC 30305(A)(1) POSSESSION OF AMMUNITION**

11 On or about October 14, 2022 in the County of San Joaquin, California, WESLEY
12 BROWNLEE did commit the crime of POSSESSION OF AMMUNITION, in violation of
13 Section 30305(a)(1) of the Penal Code, a FELONY, who at the time and place last aforesaid,
14 did unlawfully sell, own, possess and have under control ammunition and reloaded
15 ammunition. It is further alleged that the defendant is prohibited from owning or possessing a
16 firearm pursuant to sections 29800 et. seq. and 29900 et. seq. of the Penal Code and sections
17 8100 and 8103 of the Welfare and Institutions Code, having been previously convicted of the
18 following offense(s): POSSESSION OF COCAINE BASE FOR SALE, in violation of Section
19 11351.5 of the HEALTH AND SAFETY Code on MARCH 2, 2015 by and before the Superior
20 Court, County of San Joaquin, Court Case #CR-2017-0007888.

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

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1 **COUNT 6: Code Section PC 187(A) MURDER**

2 On or about April 10, 2021 in the County of Alameda, California, WESLEY BROWNLEE did
3 commit the crime of MURDER, in violation of Section 187(a) of the Penal Code, a FELONY,
4 who at the time and place last aforesaid, did willfully and unlawfully and intentionally and with
5 malice aforethought murder JUAN ALEXANDER VASQUEZ, a human being. It is further
6 alleged that the above offense is a serious felony within the meaning of Penal Code Section
7 1192.7(c)(1).

8
9 **INTENTIONAL DISCHARGE OF A FIREARM GBI/DEATH PC12022.53(D)**

10 It is further alleged that WESLEY BROWNLEE personally and intentionally discharged a
11 firearm, to-wit: A HANDGUN, which proximately caused great bodily injury and death to
12 JUAN ALEXANDER VASQUEZ within the meaning of Penal Code Section 12022.53(D).

13
14 **USE OF FIREARM IN COMMISSION OF FELONY PC12022.5(A)**

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

19
20 **PC190.2(a)(3) - SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE**
21 **MURDERS**

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

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

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1 **COUNT 7: Code Section PC 187(A) MURDER**

2 On or about April 16, 2021 in the County of Alameda, California, WESLEY BROWNLEE did
3 commit the crime of MURDER, in violation of Section 187(a) of the Penal Code, a FELONY,
4 who at the time and place last aforesaid, did willfully and unlawfully and intentionally and with
5 malice aforethought murder MERVIN HARMON, a human being. It is further alleged that the
6 above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)(1).

7

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

9 It is further alleged that WESLEY BROWNLEE personally and intentionally discharged a
10 firearm, to-wit: A HANDGUN, which proximately caused great bodily injury and death to
11 MERVIN HARMON within the meaning of Penal Code Section 12022.53(D).

12

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

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

18

19 **PC190.2(a)(3) - SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE**
20 **MURDERS**

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

23

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

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1 **COUNT 8: Code Section PC 664/187(A) ATTEMPTED MURDER**

2 On or about April 16, 2021 in the County of San Joaquin, California, WESLEY BROWNLEE
3 did commit the crime of ATTEMPTED MURDER, in violation of Section 664/187(a) of the
4 Penal Code, a FELONY, who at the time and place last aforesaid, did attempt to willfully and
5 unlawfully and intentionally and with malice aforethought murder Natasha Jeanne Latour, a
6 human being. It is further alleged that the above offense is a serious felony within the meaning
7 of Penal Code Section 1192.7(c)(39) and 667.5(c)(12).

8
9 **INTENTIONAL DISCHARGE OF A FIREARM GBI/DEATH PC12022.53(D)**

10 It is further alleged that WESLEY BROWNLEE personally and intentionally discharged a
11 firearm, to-wit: A HANDGUN which proximately caused great bodily injury and death to
12 Natasha Jeanne Latour within the meaning of Penal Code Section 12022.53(D).

13
14 For a further and separate cause of complaint, being a different offense from but connected in
15 its commission with the charge(s) above, complainant further complains and says:

16
17 **COUNT 9: Code Section PC 187(A) MURDER**

18 On or about July 8, 2022 in the County of San Joaquin, California, WESLEY BROWNLEE did
19 commit the crime of MURDER, in violation of Section 187(a) of the Penal Code, a FELONY,
20 who at the time and place last aforesaid, did willfully and unlawfully and intentionally and with
21 malice aforethought murder PAUL ALEXANDER YAW, a human being. It is further alleged
22 that the above offense is a serious felony within the meaning of Penal Code Section
23 1192.7(c)(1).

24
25 **INTENTIONAL DISCHARGE OF A FIREARM GBI/DEATH PC12022.53(D)**

26 It is further alleged that WESLEY BROWNLEE personally and intentionally discharged a
27 firearm, to-wit: A HANDGUN, which proximately caused great bodily injury and death to
28

1 PAUL ALEXANDER YAW within the meaning of Penal Code Section 12022.53(D).

2
3 **USE OF FIREARM IN COMMISSION OF FELONY PC12022.5(A)**

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

8
9 **PC190.2(a)(3) - SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE**
10 **MURDERS**

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

13
14 For a further and separate cause of complaint, being a different offense from but connected in
15 its commission with the charge(s) above, complainant further complains and says:

16
17 **COUNT 10: Code Section PC 187(A) MURDER**

18 On or about August 11, 2022 in the County of San Joaquin, California, WESLEY
19 BROWNLEE did commit the crime of MURDER, in violation of Section 187(a) of the Penal
20 Code, a FELONY, who at the time and place last aforesaid, did willfully and unlawfully and
21 intentionally and with malice aforethought murder SALVADOR WILLIAM DEBUDEY JR., a
22 human being. It is further alleged that the above offense is a serious felony within the meaning
23 of Penal Code Section 1192.7(c)(1).

24
25 **INTENTIONAL DISCHARGE OF A FIREARM GBI/DEATH PC12022.53(D)**

26 It is further alleged that WESLEY BROWNLEE personally and intentionally discharged a
27 firearm, to-wit: A HANDGUN, which proximately caused great bodily injury and death to
28

1 SALVADOR WILLIAM DEBUDEY JR. within the meaning of Penal Code Section
2 12022.53(D).

3
4 **USE OF FIREARM IN COMMISSION OF FELONY PC12022.5(A)**

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

9
10 **PC190.2(a)(3) - SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE**
11 **MURDERS**

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

14
15 If the above-named defendant(s) is/are presently on probation in San Joaquin County, any
16 evidence presented at a preliminary hearing in the instant case will be used not only as a basis
17 for a holding order in this case but also as evidence of a violation of probation and, at any
18 formal hearing on that violation of probation, the People will move the transcript of the
19 preliminary hearing into evidence as a basis for the violation.

20
21 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that the
22 defendant and his attorney disclose to the People all information and materials described in
23 Penal Code Section 1054.3.

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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.

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4 Executed on December 19, 2022, at Stockton, California.

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Deputy District Attorney

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