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SSD-78-7457
TEAM: MC
XRef: 46180

8 **SUPERIOR COURT OF CALIFORNIA**
9 **COUNTY OF SACRAMENTO**

10
11 THE PEOPLE OF THE STATE OF CALIFORNIA,
12 vs.
13 JOSEPH JAMES DEANGELO,
14 Defendant.

No. 18FE008017
FIRST AMENDED FELONY
COMPLAINT

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16 The People of the State of California upon oath of the undersigned, upon information and belief
17 complain against the defendant above named for the crime(s) as follows:
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19 **COUNT ONE**

20 On or about September 11, 1975, at and in the County of Tulare, State of California, the
21 defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a violation of Section
22 187(a) of the Penal Code of the State of California, in that said defendant did unlawfully, and
23 with malice aforethought murder CLAUDE SNELLING, a human being.
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26 It is further alleged that in the commission and attempted commission of the above offenses(s),
27 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, a .38
28 caliber pistol, within the meaning of Penal Code Sections 12022.5.
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31 **COUNT TWO**

32 For a further and separate cause of action, being a different offense of the same class of crimes
33 and offenses and connected in its commission with the charges set forth in Count One hereof: On
34 or about February 2, 1978, at and in the County of Sacramento, State of California, the
35 defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a violation of Section
36 187(a) of the Penal Code of the State of California, in that said defendant did unlawfully, and
37 with malice aforethought murder KATIE MAGGIORE, a human being.
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3 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
4 667.5(c)(1)."
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7 It is further alleged that in the commission and attempted commission of the above offenses(s),
8 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
9 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1) and 12022.5
10 also causing the above offense to become a violent felony within the meaning of Penal Code
11 Section 667.5(c)(8).
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13 **COUNT THREE**

14 For a further and separate cause of action, being a different offense of the same class of crimes
15 and offenses and connected in its commission with the charges set forth in Counts One and Two
16 hereof: On or about February 2, 1978, at and in the County of Sacramento, State of California,
17 the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a violation of
18 Section 187(a) of the Penal Code of the State of California, in that said defendant did unlawfully,
19 and with malice aforethought murder BRIAN MAGGIORE, a human being.
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22 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Sections
23 667.5(c)(1)."
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25 It is further alleged that in the commission and attempted commission of the above offense(s),
26 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, an
27 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1) and 12022.5
28 also causing the above offense to become a violent felony within the meaning of Penal Code
29 Section 667.5(c)(8).
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31 **COUNT FOUR**

32 For a further and separate cause of action, being a different offense of the same class of crimes
33 and offenses and connected in its commission with the charges set forth in Counts One through
34 Three hereof: On or about December 30, 1979, at and in the County of Santa Barbara, State of
35 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
36 violation of Section 187(a) of the Penal Code of the State of California, in that said defendant did
37 unlawfully, and with malice aforethought murder DEBRA ALEXANDRIA MANNING, a
38 human being.
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2 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
3 667.5(c)(1)."
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6 It is further alleged that in the commission and attempted commission of the above offense(s),
7 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, an
8 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1) and 12022.5
9 also causing the above offense to become a violent felony within the meaning of Penal Code
10 Section 667.5(c)(8).

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12 **1.**
13 **SPECIAL CIRCUMSTANCE**
14 **MURDER DURING COMMISSION OF RAPE**

15 It is further alleged that the murder of DEBRA ALEXANDRIA MANNING was committed
16 while defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted
17 commission of rape in violation of Penal Code section 261, pursuant to Penal Code Section
18 190.2(a)(17)(C) (Penal Code Section 190.2(c)(3)(iii) in effect on December 30, 1979).
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21 **2.**
22 **SPECIAL CIRCUMSTANCE**
23 **MURDER DURING COMMISSION OF BURGLARY**

24 It is further alleged that the murder of DEBRA ALEXANDRIA MANNING was committed
25 while defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted
26 commission of burglary in violation of Penal Code section 459, pursuant to Penal Code Section
27 190.2(a)(17)(G) (Penal Code Section 190.2(c)(3)(v) in effect on December 30, 1979).
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30 **COUNT FIVE**

31 For a further and separate cause of action, being a different offense of the same class of crimes
32 and offenses and connected in its commission with the charges set forth in Counts One through
33 Four hereof: On or about December 30, 1979, at and in the County of Santa Barbara, State of
34 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
35 violation of Section 187(a) of the Penal Code of the State of California, in that said defendant did
36 unlawfully, and with malice aforethought murder ROBERT OFFERMAN, a human being.
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3 “NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
4 667.5(c)(1).”
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7 It is further alleged that in the commission and attempted commission of the above offenses(s),
8 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
9 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1) and 12022.5
10 also causing the above offense to become a violent felony within the meaning of Penal Code
11 Section 667.5(c)(8).
12

13 **1.**
14 **SPECIAL CIRCUMSTANCE**
15 **MURDER DURING COMMISSION OF BURGLARY**

16 It is further alleged the murder of ROBERT OFFERMAN was committed while defendant,
17 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
18 burglary in violation of Penal Code section 459, pursuant to Penal Code Section 190.2(a)(17)(G)
19 (Penal Code Section 190.2(c)(3)(v) in effect on December 30, 1979).
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21 **COUNT SIX**

22 For a further and separate cause of action, being a different offense of the same class of crimes
23 and offenses and connected in its commission with the charges set forth in Counts One through
24 Five hereof: On or about July 27, 1981, at and in the County of Santa Barbara, State of
25 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
26 violation of Section 187(a) of the Penal Code of the State of California, in that said defendant did
27 unlawfully, and with malice aforethought murder CHERI DOMINGO, a human being.
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31 "NOTICE: The above offense is violent felony within the meaning of Penal Code Section
32 667.5(c)(1)."
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34 **1.**
35 **SPECIAL CIRCUMSTANCE**
36 **MURDER DURING COMMISSION OF RAPE**

37 It is further alleged that the murder of CHERI DOMINGO was committed while defendant,
38 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
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3 rape in violation of Penal Code section 261, pursuant to Penal Code Section 190.2(a)(17)(C)
4 (Penal Code Section 190.2(a)(17)(iii) in effect on July 27, 1981).

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6 **2.**
7 **SPECIAL CIRCUMSTANCE**
8 **MURDER DURING COMMISSION OF BURGLARY**

9 It is further alleged that the murder of CHERI DOMINGO was committed while defendant,
10 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
11 burglary in violation of Penal Code section 459, pursuant to Penal Code Section 190.2(a)(17)(G)
12 (Penal Code Section 190.2(a)(17)(vii) in effect on July 27, 1981).

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15 **COUNT SEVEN**

16 For a further and separate cause of action, being a different offense of the same class of crimes
17 and offenses and connected in its commission with the charges set forth in Counts One through
18 Six hereof: On or about July 27, 1981, at and in the County of Santa Barbara, State of California,
19 the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a violation of
20 Section 187(a) of the Penal Code of the State of California, in that said defendant did unlawfully,
21 and with malice aforethought murder GREG SANCHEZ, a human being.

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24 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
25 667.5(c)(1)."

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27 It is further alleged that in the commission and attempted commission of the above offenses(s),
28 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
29 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1) and 12022.5
30 also causing the above offense to become a violent felony within the meaning of Penal Code
31 Section 667.5(c)(8).
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3 **1.**
4 **SPECIAL CIRCUMSTANCE**
5 **MURDER DURING COMMISSION OF BURGLARY**

6 It is further alleged that the murder of GREG SANCHEZ was committed while defendant,
7 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
8 burglary in violation of Penal Code section 459, pursuant to Penal Code Section 190.2(a)(17)(G)
9 (Penal Code Section 190.2(a)(17)(vii) in effect on July 27, 1981).

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11 **COUNT EIGHT**

12 For a further and separate cause of action, being a different offense of the same class of crimes
13 and offenses and connected in its commission with the charges set forth in Counts One through
14 Seven hereof: On or about March 13, 1980 through March 16, 1980, at and in the County of
15 Ventura, State of California, the defendant, JOSEPH JAMES DEANGELO, did commit a
16 felony, namely: a violation of Section 187(a) of the Penal Code of the State of California, in that
17 said defendant did unlawfully, and with malice aforethought murder CHARLENE SMITH, a
18 human being.
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22 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
23 667.5(c)(1)."

24 **1.**
25 **SPECIAL CIRCUMSTANCE**
26 **MURDER DURING COMMISSION OF RAPE**

27 It is further alleged that the murder of CHARLENE SMITH was committed while defendant,
28 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
29 rape in violation of Penal Code section 261, pursuant to Penal Code Section 190.2(a)(17)(C)
30 (Penal Code Section 190.2(a)(17)(iii) in effect on March 13, 1980 through March 16, 1980).
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33 **2.**
34 **SPECIAL CIRCUMSTANCE**
35 **MURDER DURING COMMISSION OF BURGLARY**

36 It is further alleged that the murder of CHARLENE SMITH was committed while defendant,
37 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
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3 burglary in violation of Penal Code section 459, pursuant to Penal Code Section 190.2(a)(17)(G)
4 (Penal Code Section 190.2(a)(17)(vii) in effect on March 13, 1980 through March 16, 1980).
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7 **COUNT NINE**

8 For a further and separate cause of action, being a different offense of the same class of crimes
9 and offenses and connected in its commission with the charges set forth in Counts One through
10 Eight hereof: On or about March 13, 1980 through March 16, 1980, at and in the County of
11 Ventura, State of California, the defendant, JOSEPH JAMES DEANGELO, did commit a
12 felony, namely: a violation of Section 187(a) of the Penal Code of the State of California, in that
13 said defendant did unlawfully, and with malice aforethought murder LYMAN SMITH, a human
14 being.
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17 "NOTICE: The above offense is violent felony within the meaning of Penal Code Section
18 667.5(c)(1)."
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20 **1.**
21 **SPECIAL CIRCUMSTANCE**
22 **MURDER DURING COMMISSION OF BURGLARY**

23 It is further alleged that the murder of LYMAN SMITH was committed while defendant,
24 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
25 burglary in violation of Penal Code section 459, pursuant to Penal Code Section 190.2(a)(17)(G)
26 (Penal Code Section 190.2(a)(17)(vii) in effect on March 13, 1980 through March 16, 1980).
27

28 **COUNT TEN**

29 For a further and separate cause of action, being a different offense of the same class of crimes
30 and offenses and connected in its commission with the charges set forth in Counts One through
31 Nine hereof: On or about August 21, 1980, at and in the County of Orange, State of California,
32 the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a violation of
33 Section 187(a) of the Penal Code of the State of California, in that said defendant did unlawfully,
34 and with malice aforethought murder PATRICE HARRINGTON, a human being.
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3 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
4 667.5(c)(1)."
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6 **1.**
7 **SPECIAL CIRCUMSTANCE**
8 **MURDER DURING COMMISSION OF RAPE**

9 It is further alleged the murder of PATRICE HARRINGTON was committed while defendant,
10 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
11 rape in violation of Penal Code section 261, pursuant to Penal Code Section 190.2(a)(17)(C)
12 (Penal Code Section 190.2(a)(17)(iii) in effect on August 21, 1980).
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15 **2.**
16 **SPECIAL CIRCUMSTANCE**
17 **MURDER DURING COMMISSION OF BURGLARY**

18 It is further alleged that the murder of PATRICE HARRINGTON was committed while
19 defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted
20 commission of burglary in violation of Penal Code section 459, pursuant to Penal Code Section
21 190.2(a)(17)(G) (Penal Code Section 190.2(a)(17)(vii) in effect on August 21, 1980).
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24 **COUNT ELEVEN**

25 For a further and separate cause of action, being a different offense of the same class of crimes
26 and offenses and connected in its commission with the charges set forth in Counts One through
27 Ten hereof: On or about August 21, 1980, at and in the County of Orange, State of California,
28 the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a violation of
29 Section 187(a) of the Penal Code of the State of California, in that said defendant did unlawfully,
30 and with malice aforethought murder KEITH HARRINGTON, a human being.
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33 "NOTICE: The above offense is violent felony within the meaning of Penal Code Section
34 667.5(c)(1)."
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3 **1.**
4 **SPECIAL CIRCUMSTANCE**
5 **MURDER DURING COMMISSION OF BURGLARY**

6 It is further alleged that the murder of KEITH HARRINGTON was committed while defendant,
7 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
8 burglary in violation of Penal Code section 459, pursuant to Penal Code Section 190.2(a)(17)(G)
9 (Penal Code Section 190.2(a)(17)(vii) in effect on August 21, 1980).

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11 **COUNT TWELVE**

12 For a further and separate cause of action, being a different offense of the same class of crimes
13 and offenses and connected in its commission with the charges set forth in Counts One through
14 Eleven hereof: On or about February 6, 1981, at and in the County of Orange, State of
15 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
16 violation of Section 187(a) of the Penal Code of the State of California, in that said defendant did
17 unlawfully, and with malice aforethought murder MANUELA WITTHUHN, a human being.
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20 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
21 667.5(c)(1)."
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23 **1.**
24 **SPECIAL CIRCUMSTANCE**
25 **MURDER DURING COMMISSION OF RAPE**

26 It is further alleged that the murder of MANUELA WITTHUHN was committed while
27 defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted
28 commission of rape in violation of Penal Code section 261, pursuant to Penal Code Section
29 190.2(a)(17)(C) (Penal Code Section 190.2(a)(17)(iii) in effect on February 6, 1981).
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32 **2.**
33 **SPECIAL CIRCUMSTANCE**
34 **MURDER DURING COMMISSION OF BURGLARY**

35 It is further alleged that the murder of MANUELA WITTHUHN was committed while
36 defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted
37 commission of burglary in violation of Penal Code section 459, pursuant to Penal Code Section
38 190.2(a)(17)(G) (Penal Code Section 190.2(a)(17)(vii) in effect on February 6, 1981).
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3 **3.**
4 **SPECIAL CIRCUMSTANCE**
5 **MURDER DURING COMMISSION OF ROBBERY**

6 It is further alleged that the murder of MANUELA WITTHUHN was committed while
7 defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted
8 commission of robbery in violation of Penal Code section 211, pursuant to Penal Code Section
9 190.2(a)(17)(A) (Penal Code Section 190.2(a)(17)(i) in effect on February 6, 1981).

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11 **COUNT THIRTEEN**

12 For a further and separate cause of action, being a different offense of the same class of crimes
13 and offenses and connected in its commission with the charges set forth in Counts One through
14 Twelve hereof: On or about May 5, 1986, at and in the County of Orange, State of California, the
15 defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a violation of Section
16 187(a) of the Penal Code of the State of California, in that said defendant did unlawfully, and
17 with malice aforethought murder JANELLE CRUZ, a human being.

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20 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
21 667.5(c)(1)."
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23 **1.**
24 **SPECIAL CIRCUMSTANCE**
25 **MURDER DURING COMMISSION OF RAPE**

26 It is further alleged that the murder of JANELLE CRUZ was committed while defendant,
27 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
28 rape in violation of Penal Code section 261, pursuant to Penal Code Section 190.2(a)(17)(C)
29 (Penal Code Section 190.2(a)(17)(iii) in effect on May 5, 1986).
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32 **2.**
33 **SPECIAL CIRCUMSTANCE**
34 **MURDER DURING COMMISSION OF BURGLARY**

35 It is further alleged that the murder of JANELLE CRUZ was committed while defendant,
36 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
37 burglary in violation of Penal Code section 459, pursuant to Penal Code Section 190.2(a)(17)(G)
38 (Penal Code Section 190.2(a)(17)(vii) in effect on May 5, 1986).
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3 **SPECIAL CIRCUMSTANCE**
4 **MULTIPLE MURDER**
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6 It is further alleged that the offense(s) charged in count(s) Two through Thirteen are a special
7 circumstance, in that the defendant committed multiple murders, within the meaning of Penal
8 Code Section 190.2(a)(3) and Penal Code Section 190.2(c)(5).
9

10 **COUNT FOURTEEN**

11 For a further and separate cause of action, being a different offense of the same class of crimes
12 and offenses and connected in its commission with the charges set forth in Counts One through
13 Thirteen hereof: On or about September 4, 1976, at and in the County of Sacramento, State of
14 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
15 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
16 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #1, to commit
17 Robbery.
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21 It is further alleged that in the commission and attempted commission of the above offenses(s),
22 the said defendant, JOSEPH JAMES DEANGELO, personally used a knife and/or dirk or
23 dagger, within the meaning of Penal Code Section 12022.
24

25 **COUNT FIFTEEN**

26 For a further and separate cause of action, being a different offense of the same class of crimes
27 and offenses and connected in its commission with the charges set forth in Counts One through
28 Fourteen hereof: On or about April 2, 1977, at and in the County of Sacramento, State of
29 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
30 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
31 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #2, to commit
32 Robbery.
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36 It is further alleged that in the commission and attempted commission of the above offenses(s),
37 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
38 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
39 12022.5.
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2 **COUNT SIXTEEN**

3 For a further and separate cause of action, being a different offense of the same class of crimes
4 and offenses and connected in its commission with the charges set forth in Counts One through
5 Fifteen hereof: On or about April 15, 1977, at and in the County of Sacramento, State of
6 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
7 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
8 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #3, to commit
9 Robbery.
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12 It is further alleged that in the commission and attempted commission of the above offenses(s),
13 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
14 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
15 12022.5.
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18 It is further alleged that in the commission and attempted commission of the above offenses(s),
19 the said defendant, JOSEPH JAMES DEANGELO, personally used a knife and/or dirk or
20 dagger, within the meaning of Penal Code Section 12022.
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22 **COUNT SEVENTEEN**

23 For a further and separate cause of action, being a different offense of the same class of crimes
24 and offenses and connected in its commission with the charges set forth in Counts One through
25 Sixteen hereof: On or about May 3, 1977, at and in the County of Sacramento, State of
26 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
27 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
28 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #4, to commit
29 Robbery.
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33 It is further alleged It is further alleged that in the commission and attempted commission of the
34 above offenses(s), the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm,
35 to wit, and unknown caliber firearm, within the meaning of Penal Code Sections
36 1203.06(a)(1)(v) and 12022.5.
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2 **COUNT EIGHTEEN**

3 For a further and separate cause of action, being a different offense of the same class of crimes
4 and offenses and connected in its commission with the charges set forth in Counts One through
5 Seventeen hereof: On or about May 14, 1977, at and in the County of Sacramento, State of
6 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
7 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
8 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #5, to commit
9 Robbery.
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12 It is further alleged that in the commission and attempted commission of the above offenses(s),
13 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
14 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
15 12022.5.
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18 It is further alleged that in the commission and attempted commission of the above offenses(s),
19 the said defendant, JOSEPH JAMES DEANGELO, personally used a knife and/or dirk or
20 dagger, within the meaning of Penal Code Section 12022.
21

22 **COUNT NINETEEN**

23 For a further and separate cause of action, being a different offense of the same class of crimes
24 and offenses and connected in its commission with the charges set forth in Counts One through
25 Eighteen hereof: On or about May 17, 1977, at and in the County of Sacramento, State of
26 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
27 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
28 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #6, to commit
29 Robbery.
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33 It is further alleged that in the commission and attempted commission of the above offenses(s),
34 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
35 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
36 12022.5.
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3 It is further alleged that in the commission and attempted commission of the above offenses(s),
4 the said defendant, JOSEPH JAMES DEANGELO, personally used a knife and/or dirk or
5 dagger, within the meaning of Penal Code Section 12022.
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8 **COUNT TWENTY**

9 For a further and separate cause of action, being a different offense of the same class of crimes
10 and offenses and connected in its commission with the charges set forth in Counts One through
11 Nineteen hereof: On or about May 28, 1977, at and in the County of Sacramento, State of
12 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
13 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
14 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #7, to commit
15 Robbery.
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18 It is further alleged that in the commission and attempted commission of the above offenses(s),
19 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
20 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
21 12022.5.
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24 It is further alleged that in the commission and attempted commission of the above offenses(s),
25 the said defendant, JOSEPH JAMES DEANGELO, personally used a knife and/or dirk or
26 dagger, within the meaning of Penal Code Section 12022.
27

28 **COUNT TWENTY-ONE**

29 For a further and separate cause of action, being a different offense of the same class of crimes
30 and offenses and connected in its commission with the charges set forth in Counts One through
31 Twenty hereof: On or about October 1, 1977, at and in the County of Sacramento, State of
32 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
33 violation of Section 209(b) of the Penal Code of the State of California, in that said JOSEPH
34 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #8, to commit
35 Robbery.
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3 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
4 667.5(c)(7)."
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7 It is further alleged that in the commission and attempted commission of the above offenses(s),
8 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
9 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
10 12022.5 also causing the above offense to become a violent felony within the meaning of Penal
11 Code Section 667.5(c)(8).
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14 It is further alleged that in the commission and attempted commission of the above offenses(s),
15 the said defendant, JOSEPH JAMES DEANGELO, personally used a knife and/or dirk or
16 dagger, within the meaning of Penal Code Section 12022(b).
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18 **COUNT TWENTY-TWO**

19 For a further and separate cause of action, being a different offense of the same class of crimes
20 and offenses and connected in its commission with the charges set forth in Counts One through
21 Twenty-One hereof: On or about October 21, 1977, at and in the County of Sacramento, State of
22 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
23 violation of Section 209(b) of the Penal Code of the State of California, in that said JOSEPH
24 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #9, to commit
25 Robbery.
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29 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
30 667.5(c)(7)."
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32 It is further alleged that in the commission and attempted commission of the above offenses(s),
33 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
34 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
35 12022.5 also causing the above offense to become a violent felony within the meaning of Penal
36 Code Section 667.5(c)(8).
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3 It is further alleged that in the commission and attempted commission of the above offenses(s),
4 the said defendant, JOSEPH JAMES DEANGELO, personally used a knife and/or dirk or
5 dagger, within the meaning of Penal Code Section 12022(b).
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8 **COUNT TWENTY-THREE**

9 For a further and separate cause of action, being a different offense of the same class of crimes
10 and offenses and connected in its commission with the charges set forth in Counts One through
11 Twenty-Two hereof: On or about October 7, 1978, at and in the County of Contra Costa County,
12 State of California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony,
13 namely: a violation of Section 209(b) of the Penal Code of the State of California, in that said
14 JOSEPH JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #10, to
15 commit Robbery.
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18 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
19 667.5(c)(7)."
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22 It is further alleged that in the commission and attempted commission of the above offenses(s),
23 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
24 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
25 12022.5 also causing the above offense to become a violent felony within the meaning of Penal
26 Code Section 667.5(c)(8).
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29 It is further alleged that in the commission and attempted commission of the above offenses(s),
30 the said defendant, JOSEPH JAMES DEANGELO, personally used a knife and/or dirk or
31 dagger, within the meaning of Penal Code Section 12022(b).
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33 **COUNT TWENTY-FOUR**

34 For a further and separate cause of action, being a different offense of the same class of crimes
35 and offenses and connected in its commission with the charges set forth in Counts One through
36 Twenty-Three hereof: On or about October 13, 1978, at and in the County of Contra Costa
37 County, State of California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony,
38 namely: a violation of Section 209(b) of the Penal Code of the State of California, in that said
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3 JOSEPH JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #11, to
4 commit Robbery.
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7 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
8 667.5(c)(7)."
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10 It is further alleged that in the commission and attempted commission of the above offenses(s),
11 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
12 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
13 12022.5 also causing the above offense to become a violent felony within the meaning of Penal
14 Code Section 667.5(c)(8).
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17 **COUNT TWENTY-FIVE**

18 For a further and separate cause of action, being a different offense of the same class of crimes
19 and offenses and connected in its commission with the charges set forth in Counts One through
20 Twenty-Four hereof: On or about October 28, 1978, at and in the County of Contra Costa
21 County, State of California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony,
22 namely: a violation of Section 209(b) of the Penal Code of the State of California, in that said
23 JOSEPH JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #12, to
24 commit Robbery.
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27 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
28 667.5(c)(7)."
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31 It is further alleged that in the commission and attempted commission of the above offenses(s),
32 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
33 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
34 12022.5 also causing the above offense to become a violent felony within the meaning of Penal
35 Code Section 667.5(c)(8).
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3 It is further alleged that in the commission and attempted commission of the above offenses(s),
4 the said defendant, JOSEPH JAMES DEANGELO, personally used a knife and/or dirk or
5 dagger, within the meaning of Penal Code Section 12022(b).
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8 **COUNT TWENTY-SIX**

9 For a further and separate cause of action, being a different offense of the same class of crimes
10 and offenses and connected in its commission with the charges set forth in Counts One through
11 Twenty-Five hereof: On or about June 11, 1979, at and in the County of Contra Costa County,
12 State of California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony,
13 namely: a violation of Section 209(b) of the Penal Code of the State of California, in that said
14 JOSEPH JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #13, to
15 commit Robbery.
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18 "NOTICE: The above offense is a felony within the meaning of Penal Code Section 667.5(c)(7)."
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20 It is further alleged that in the commission and attempted commission of the above offenses(s),
21 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
22 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
23 12022.5 also causing the above offense to become a violent felony within the meaning of Penal
24 Code Section 667.5(c)(8).
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27 It is further alleged, as to Counts One through Twenty-Six, that in the commission and attempted
28 commission of the above offenses including Murder as alleged in Counts One through Thirteen
29 and Kidnapping to Commit Robbery in Counts Fourteen through Twenty-Six that the said
30 defendant pursuant to Penal Code section 781 did commit public offenses in part in one
31 jurisdictional territory namely, Contra Costa County, Tulare County, Orange County, Santa
32 Barbara County, and Ventura County, and in part in another jurisdictional territory namely,
33 Sacramento County, or the act or effects thereof constituting or requisite to the consummation of
34 the offense occurred in two or more jurisdictional territories, the jurisdiction of such offense is in
35 any competent court within either jurisdictional territory; or pursuant to Penal Code section
36 784.7, where a violation of an enumerated offense occurs in more than one jurisdictional
37 territory, the jurisdiction for any of those offenses, and for any of the offenses properly joinable
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with that offense, is in any jurisdiction where at least one of those offenses occurred, and all district attorneys with jurisdiction of the offenses agree to venue; or pursuant to Penal Code section 786, if property is taken in one jurisdictional territory has been brought into another, the jurisdiction of the offense is in any continuous jurisdictional territory if the arrest is made within the contiguous territory; or pursuant to Penal Code section 790 if a defendant is charged with a special circumstance pursuant to section 190.2(a)(3)/190.2(c)(5), the jurisdiction for any charged murder, and for any crimes properly joinable with that murder, shall be in any county that has jurisdiction pursuant to section 790(a) for one or more of the murders charged in a single complaint as long as the murder are “connected together in their commission” as that phrase is used in Penal Code section 954.

I declare upon information and belief and under penalty of perjury that the foregoing is true and correct.

Executed at Sacramento County, California, the 20th day of August, 2018.



THE HONORABLE DIANA BECTON
CONTRA COSTA COUNTY DISTRICT ATTORNEY



THE HONORABLE TONY RACKAUCKAS
ORANGE COUNTY DISTRICT ATTORNEY



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THE HONORABLE ANNE MARIE SCHUBERT
SACRAMENTO COUNTY DISTRICT ATTORNEY



THE HONORABLE JOYCE DUDLEY
SANTA BARBARA COUNTY DISTRICT ATTORNEY



THE HONORABLE TIM WARD
TULARE COUNTY DISTRICT ATTORNEY



THE HONORABLE GREG TOTTEN
VENTURA COUNTY DISTRICT ATTORNEY

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HOLDING ORDER

_____ It appearing to me that the offense(s) in the within complaint has/have been committed,
and that there is sufficient cause to believe that the defendant, JOSEPH JAMES
DEANGELO, is guilty thereof,

_____ The defendant, JOSEPH JAMES DEANGELO, having waived preliminary hearing to the
offense(s) set forth in this complaint,

Exceptions/Additions/Conditions: _____

I order that the defendant be held to answer to same. In my capacity as Judge of the Superior
Court, I deem the within complaint to be an Information and order it filed in the Superior Court.

Date: _____ Dept: _____

Judge of the Superior Court Sitting as Magistrate

