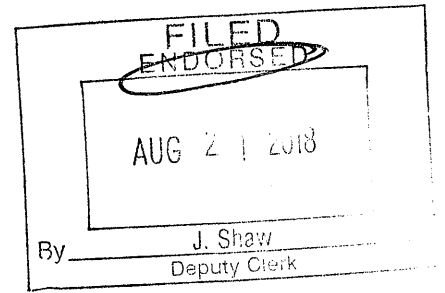


1
2 ANNE MARIE SCHUBERT
3 DISTRICT ATTORNEY
4 901 G STREET
5 SACRAMENTO, CA 95814
6 (916) 874-6218

SSD-78-7457
TEAM: MC
XRef: 46180



7
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

15
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:
18

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.
24

25
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.
29

30
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.
38
39
40
41



1
2
3 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
4 667.5(c)(1)."
5
6

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 **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.
20

21
22 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Sections
23 667.5(c)(1)."
24

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).
30

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.
39
40
41



1
2 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
3 667.5(c)(1)."
4

5
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).
11

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).
19

20 **2.**
21 **SPECIAL CIRCUMSTANCE**
22 **MURDER DURING COMMISSION OF BURGLARY**
23

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).
28

29 **COUNT FIVE**
30

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.
37
38
39
40
41



1
2
3 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
4 667.5(c)(1)."
5
6

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).
20

21
22 **COUNT SIX**

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 Five hereof: On or about July 27, 1981, at and in the County of Santa Barbara, State of
26 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
27 violation of Section 187(a) of the Penal Code of the State of California, in that said defendant did
28 unlawfully, and with malice aforethought murder CHERI DOMINGO, a human being.
29

30
31 "NOTICE: The above offense is violent felony within the meaning of Penal Code Section
32 667.5(c)(1)."
33

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
39
40
41



1
2
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).
5

6
7 **2.**
8 **SPECIAL CIRCUMSTANCE**
9 **MURDER DURING COMMISSION OF BURGLARY**
10

11 It is further alleged that the murder of CHERI DOMINGO was committed while defendant,
12 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
13 burglary in violation of Penal Code section 459, pursuant to Penal Code Section 190.2(a)(17)(G)
14 (Penal Code Section 190.2(a)(17)(vii) in effect on July 27, 1981).
15

16 **COUNT SEVEN**

17 For a further and separate cause of action, being a different offense of the same class of crimes
18 and offenses and connected in its commission with the charges set forth in Counts One through
19 Six hereof: On or about July 27, 1981, at and in the County of Santa Barbara, State of California,
20 the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a violation of
21 Section 187(a) of the Penal Code of the State of California, in that said defendant did unlawfully,
22 and with malice aforethought murder GREG SANCHEZ, a human being.
23

24 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
25 667.5(c)(1)."
26

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).
32
33
34
35
36
37
38
39
40
41



1
2
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).

10
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.
19

20
21
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).
31

32
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
38
39
40
41



1
2
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).
5
6

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.
15

16
17 "NOTICE: The above offense is violent felony within the meaning of Penal Code Section
18 667.5(c)(1)."
19

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.
35
36
37
38
39
40
41



1
2
3 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
4 667.5(c)(1)."
5

6
7 **1.**
8 **SPECIAL CIRCUMSTANCE**
9 **MURDER DURING COMMISSION OF RAPE**

10 It is further alleged the murder of PATRICE HARRINGTON was committed while defendant,
11 JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of
12 rape in violation of Penal Code section 261, pursuant to Penal Code Section 190.2(a)(17)(C)
13 (Penal Code Section 190.2(a)(17)(iii) in effect on August 21, 1980).
14

15
16 **2.**
17 **SPECIAL CIRCUMSTANCE**
18 **MURDER DURING COMMISSION OF BURGLARY**

19 It is further alleged that the murder of PATRICE HARRINGTON was committed while
20 defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted
21 commission of burglary in violation of Penal Code section 459, pursuant to Penal Code Section
22 190.2(a)(17)(G) (Penal Code Section 190.2(a)(17)(vii) in effect on August 21, 1980).
23

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.
31

32
33 "NOTICE: The above offense is violent felony within the meaning of Penal Code Section
34 667.5(c)(1)."
35
36
37
38
39
40
41



1
2
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).

10
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.

18
19
20 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
21 667.5(c)(1)."
22

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).

30
31
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).



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41

3.
SPECIAL CIRCUMSTANCE
MURDER DURING COMMISSION OF ROBBERY

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

COUNT THIRTEEN

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

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

1.
SPECIAL CIRCUMSTANCE
MURDER DURING COMMISSION OF RAPE

It is further alleged that the murder of JANELLE CRUZ was committed while defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of rape in violation of Penal Code section 261, pursuant to Penal Code Section 190.2(a)(17)(C) (Penal Code Section 190.2(a)(17)(iii) in effect on May 5, 1986).

2.
SPECIAL CIRCUMSTANCE
MURDER DURING COMMISSION OF BURGLARY

It is further alleged that the murder of JANELLE CRUZ was committed while defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of burglary in violation of Penal Code section 459, pursuant to Penal Code Section 190.2(a)(17)(G) (Penal Code Section 190.2(a)(17)(vii) in effect on May 5, 1986).



1
2
3 **SPECIAL CIRCUMSTANCE**
4 **MULTIPLE MURDER**
5

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
11 **COUNT FOURTEEN**

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 Thirteen hereof: On or about September 4, 1976, at and in the County of Sacramento, State of
15 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
16 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
17 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #1, to commit
18 Robbery.
19

20
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
26 **COUNT FIFTEEN**

27 For a further and separate cause of action, being a different offense of the same class of crimes
28 and offenses and connected in its commission with the charges set forth in Counts One through
29 Fourteen hereof: On or about April 2, 1977, at and in the County of Sacramento, State of
30 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
31 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
32 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #2, to commit
33 Robbery.
34

35
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.
40
41



1
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.
10

11
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.
16

17
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
23 **COUNT SEVENTEEN**

24 For a further and separate cause of action, being a different offense of the same class of crimes
25 and offenses and connected in its commission with the charges set forth in Counts One through
26 Sixteen hereof: On or about May 3, 1977, at and in the County of Sacramento, State of
27 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
28 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
29 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #4, to commit
30 Robbery.
31

32
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.
37
38
39
40
41



1
2
3 **COUNT EIGHTEEN**
4

5 For a further and separate cause of action, being a different offense of the same class of crimes
6 and offenses and connected in its commission with the charges set forth in Counts One through
7 Seventeen hereof: On or about May 14, 1977, at and in the County of Sacramento, State of
8 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
9 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
10 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #5, to commit
11 Robbery.

12
13 It is further alleged that in the commission and attempted commission of the above offenses(s),
14 the said defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, and
15 unknown caliber firearm, within the meaning of Penal Code Sections 1203.06(a)(1)(v) and
16 12022.5.

17
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
23 **COUNT NINETEEN**

24 For a further and separate cause of action, being a different offense of the same class of crimes
25 and offenses and connected in its commission with the charges set forth in Counts One through
26 Eighteen hereof: On or about May 17, 1977, at and in the County of Sacramento, State of
27 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
28 violation of Section 209 of the Penal Code of the State of California, in that said JOSEPH
29 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #6, to commit
30 Robbery.
31

32
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.
37
38
39
40
41



1
2
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.
6

7
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.
16

17
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.
22

23
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
29 **COUNT TWENTY-ONE**

30 For a further and separate cause of action, being a different offense of the same class of crimes
31 and offenses and connected in its commission with the charges set forth in Counts One through
32 Twenty hereof: On or about October 1, 1977, at and in the County of Sacramento, State of
33 California, the defendant, JOSEPH JAMES DEANGELO, did commit a felony, namely: a
34 violation of Section 209(b) of the Penal Code of the State of California, in that said JOSEPH
35 JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #8, to commit
36 Robbery.
37
38
39
40
41



1
2
3 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
4 667.5(c)(7)."
5
6

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).
12

13
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).
17

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.
26
27

28
29 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
30 667.5(c)(7)."
31

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).
37
38
39
40
41



1
2
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).
6

7
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.
16

17
18 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
19 667.5(c)(7)."
20

21
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).
27

28
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).
32

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
39
40
41



1
2
3 JOSEPH JAMES DEANGELO did unlawfully kidnap and carry away JANE DOE #11, to
4 commit Robbery.
5

6
7 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
8 667.5(c)(7)."
9

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).
15

16
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.
25

26
27 "NOTICE: The above offense is a violent felony within the meaning of Penal Code Section
28 667.5(c)(7)."
29

30
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).
36
37
38
39
40
41



1
2
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).
6

7
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.
16

17
18 "NOTICE: The above offense is a felony within the meaning of Penal Code Section 667.5(c)(7)."
19

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).
25

26
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
38
39
40
41

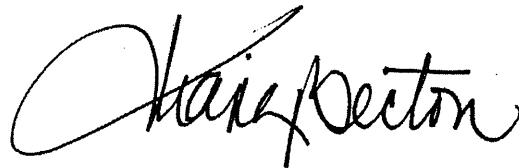


1
2
3 with that offense, is in any jurisdiction where at least one of those offenses occurred, and all
4 district attorneys with jurisdiction of the offenses agree to venue; or pursuant to Penal Code
5 section 786, if property is taken in one jurisdictional territory has been brought into another, the
6 jurisdiction of the offense is in any continuous jurisdictional territory if the arrest is made within
7 the contiguous territory; or pursuant to Penal Code section 790 if a defendant is charged with a
8 special circumstance pursuant to section 190.2(a)(3)/190.2(c)(5), the jurisdiction for any charged
9 murder, and for any crimes properly joinable with that murder, shall be in any county that has
10 jurisdiction pursuant to section 790(a) for one or more of the murders charged in a single
11 complaint as long as the murder are "connected together in their commission" as that phrase is
12 used in Penal Code section 954.
13
14
15
16

17 I declare upon information and belief and under penalty of perjury that the foregoing is true and
18 correct.
19

20 Executed at Sacramento County, California, the 20th day of August, 2018.
21
22

23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41



THE HONORABLE DIANA BECTON
CONTRA COSTA COUNTY DISTRICT ATTORNEY



THE HONORABLE TONY RACKAUCKAS
ORANGE COUNTY DISTRICT ATTORNEY



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41

Ann Marie Schubert

THE HONORABLE ANN MARIE SCHUBERT
SACRAMENTO COUNTY DISTRICT ATTORNEY

Joyce E. Dudley

THE HONORABLE JOYCE DUDLEY
SANTA BARBARA COUNTY DISTRICT ATTORNEY

Tim Ward

THE HONORABLE TIM WARD
TULARE COUNTY DISTRICT ATTORNEY

Greg Totten

THE HONORABLE GREG TOTTON
VENTURA COUNTY DISTRICT ATTORNEY



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41

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

