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

SPD-19-193994
R. NORGAARD, DDA
TEAM: HOMICIDES
06/24/2019 (IC)
XRef: 2850371

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10 **SUPERIOR COURT OF CALIFORNIA**
11 **COUNTY OF SACRAMENTO**

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14 THE PEOPLE OF THE STATE OF CALIFORNIA,
15 vs.
16 ADEL SAMBRANO RAMOS (10153598-01),
17 Defendant.

No.
FELONY COMPLAINT

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

26 On or about June 19, 2019, at and in the County of Sacramento, State of California, the
27 defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of Section
28 187(a) of the Penal Code of the State of California, in that said defendant did unlawfully, and
29 with malice aforethought murder SACRAMENTO POLICE OFFICER TARA O'SULLIVAN, a
30 human being.
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33 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
34 1192.7(c)."
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2 **SPECIAL CIRCUMSTANCE**

3 **1.**

4 It is further alleged that the murder of the SACRAMENTO POLICE OFFICER TARA
5 O'SULLIVAN was committed by the defendant, ADEL SAMBRANO RAMOS, and that
6 SACRAMENTO POLICE OFFICER TARA O'SULLIVAN was a peace officer who was
7 intentionally killed while engaged in the performance of her duties, and that said defendant knew
8 and reasonably should have known that SACRAMENTO POLICE OFFICER TARA
9 O'SULLIVAN was a peace officer engaged in the performance of her duties, within the meaning
10 of Penal Code Section 190.2(a)(7).
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12 **SPECIAL CIRCUMSTANCE**

13 **2.**

14 It is further alleged that the murder of the SACRAMENTO POLICE OFFICER TARA
15 O'SULLIVAN was committed by the defendant, ADEL SAMBRANO RAMOS, and that the
16 defendant intentionally killed the victim while lying in wait, within the meaning of Penal Code
17 Section 190.2(a)(15).
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19 It is further alleged that, pursuant to subdivisions (b), (c) and (d) of Penal Code Section
20 12022.53, and in the commission and attempted commission of the above offense(s), the
21 defendant, ADEL SAMBRANO RAMOS, used, and intentionally and personally discharged a
22 firearm , to wit, an illegal .223 assault rifle, and thereby proximately caused death to
23 SACRAMENTO POLICE OFFICER TARA O'SULLIVAN, who was not an accomplice of the
24 defendant, within the meaning of Penal Code Section 12022.53(d).
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29 **COUNT TWO**

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 Count One hereof: On
32 or about June 19, 2019, at and in the County of Sacramento, State of California, the defendant,
33 ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of Section 664/187(a)
34 of the Penal Code of the State of California, in that said defendant did unlawfully, and with
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2 malice aforethought attempt to murder SACRAMENTO POLICE OFFICER DANIEL CHIPP, a
3 human being.
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5 "NOTICE: The above offense is a serious and violent felony within the meaning of Penal Code
6 Sections 1192.7(c)(1) and 667.5(c)(1)."
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9 It is further alleged that the defendant, ADEL SAMBRANO RAMOS, committed the charged
10 crime upon a peace officer and the defendant knew or reasonably should have known the victim
11 was a peace officer engaged in the performance of her duties, within the meaning of Penal Code
12 Section 664(e)(1).
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15 It is further alleged that, pursuant to subdivision (b), of Penal Code Section 12022.53, and in the
16 commission and attempted commission of the above offense(s), the defendant, ADEL
17 SAMBRANO RAMOS, used, and intentionally and personally discharged a firearm, to wit, an
18 illegal .223 assault rifle, within the meaning of Penal Code Section 12022.53(b).
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21 **COUNT THREE**

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 and Two
24 hereof: On or about June 19, 2019, at and in the County of Sacramento, State of California, the
25 defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of Section
26 30605(a) of the Penal Code of the State of California, in that said defendant did willfully and
27 unlawfully possess an assault weapon as defined in Penal Code Sections 30510 and 30515, to
28 wit, a semi-automatic center fire AR-15 style rifle built upon an unfinished 80% receiver with a
29 non-fixed magazine and with a pistol grip which protrudes conspicuously below the action of the
30 weapon.
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COUNT FOUR

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 Three hereof: On or about June 19, 2019, at and in the County of Sacramento, State of California, the defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of Section 30605(a) of the Penal Code of the State of California, in that said defendant did willfully and unlawfully possess an assault weapon as defined in Penal Code Sections 30510 and 30515, to wit, a semi-automatic center fire AR-15 style rifle built upon an unfinished 80% receiver with a non-fixed magazine, a pistol grip which protrudes conspicuously below the action of the weapon and a telescoping stock.

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

Executed at Sacramento County, California, the 21st day of June, 2019.



ROD NORGAARD
SACRAMENTO COUNTY DISTRICT ATTORNEY
(916) 874-6218
Telephone Number

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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, ADEL SAMBRANO
RAMOS, is guilty thereof,

_____ The defendant, ADEL SAMBRANO RAMOS, 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

