

1 JEFFREY WILSON
2 Placer County District Attorney (Acting)
3 State Bar No. 193638
4 10810 Justice Center Drive, Suite 240
5 Roseville, CA 95678-6231

6 Tel: (916) 543-8000
7 Fax: (916) 543-2550

FILED
Superior Court of California
County of Placer

FEB 13 2020

Jake Chatters
Executive Officer & Clerk
By: K. Potter, Deputy

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF PLACER**

10 ---oOo---

11 THE PEOPLE OF THE
12 STATE OF CALIFORNIA,

13 Plaintiff,

14 -vs-

15 JAMES BRIAN RHODES
16 aka: JAMES B. RHODES

17 Defendant.
18 _____/

DA NO. 20-01-134389

COURT NO. **62-171558**

FELONY COMPLAINT

SXU

19 **COUNT ONE**

20
21 On or about March 27, 2019, in the County of SACRAMENTO, the
22 crime of SEXUAL PENETRATION BY FOREIGN OBJECT, in violation of PENAL
23 CODE SECTION 289(h), a felony, was committed by JAMES BRIAN RHODES,
24 who committed an act of sexual penetration against JANE DOE who was
25 under the age of 18 years.
26
27
28

1 "NOTICE: The above offense is a serious felony within the
2 meaning of Penal Code section 1192.7(c)."
3

4 It is further alleged that probation shall not be granted to,
5 nor shall the execution or imposition of sentence be suspended
6 pursuant to Penal Code Section 1203.65(a).
7

8 "NOTICE: Conviction of this offense will require you to
9 register pursuant to Penal Code Section 290. Registration pursuant
10 to Penal Code section 290 will be for the rest of your life. Willful
11 failure to register is a crime."
12

13 "NOTICE: Pursuant to the provisions of PC Section 293.5 the
14 use of pseudonym "Jane or John Doe", if it appears in the complaint
15 or information, is for purposes of protecting the privacy of the
16 alleged victim."
17
18

19
20
21
22
23 **COUNT TWO**
24

25 On or about March 27, 2019, in the County of SACRAMENTO, the
26 crime of ORAL COPULATION OF A PERSON UNDER 18, in violation of Penal
27 Code section 287(b)(1), a felony, was committed by JAMES BRIAN
28

1 RHODES, who did unlawfully participate in an act of oral copulation
2 with JANE DOE, a person under the age of eighteen years.
3

4 **COUNT THREE**

5
6 On or about April 24, 2019, in the County of Placer, the crime
7 of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code section
8 261.5(c), a felony, was committed by JAMES BRIAN RHODES, engaged in
9 an act of unlawful sexual intercourse with JANE DOE, a minor, not
10 the spouse of the defendant, the minor being more than three years
11 younger than the defendant.
12

13
14 **COUNT FOUR**

15
16
17 On or about April 27, 2019, in the County of Placer, the crime
18 of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code section
19 261.5(c), a felony, was committed by JAMES BRIAN RHODES, engaged in
20 an act of unlawful sexual intercourse with JANE DOE, a minor, not
21 the spouse of the defendant, the minor being more than three years
22 younger than the defendant.
23
24
25
26
27
28

COUNT FIVE

1
2
3 On or about May 17, 2019, in the County of Placer and/or
4 SACRAMENTO, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation
5 of Penal Code section 261.5(c), a felony, was committed by JAMES
6 BRIAN RHODES, engaged in an act of unlawful sexual intercourse with
7 JANE DOE, a minor, not the spouse of the defendant, the minor being
8 more than three years younger than the defendant.
9

10
11 **COUNT SIX**

12 On or about May 19, 2019, in the County of Placer, the crime of
13 UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code section
14 261.5(c), a felony, was committed by JAMES BRIAN RHODES, engaged in
15 an act of unlawful sexual intercourse with JANE DOE, a minor, not
16 the spouse of the defendant, the minor being more than three years
17 younger than the defendant.
18

19
20 **COUNT SEVEN**

21
22
23 On or about May 20, 2019, in the County of Placer and/or
24 SACRAMENTO, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation
25 of Penal Code section 261.5(c), a felony, was committed by JAMES
26 BRIAN RHODES, engaged in an act of unlawful sexual intercourse with
27
28

1 JANE DOE, a minor, not the spouse of the defendant, the minor being
2 more than three years younger than the defendant.
3

4 **COUNT EIGHT**
5

6 On or about May 26, 2019, in the County of SACRAMENTO, the
7 crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code
8 section 261.5(c), a felony, was committed by JAMES BRIAN RHODES,
9 engaged in an act of unlawful sexual intercourse with JANE DOE, a
10 minor, not the spouse of the defendant, the minor being more than
11 three years younger than the defendant.
12
13

14 **COUNT NINE**
15

16
17 On or about May 28, 2019, in the County of SACRAMENTO, the
18 crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code
19 section 261.5(c), a felony, was committed by JAMES BRIAN RHODES,
20 engaged in an act of unlawful sexual intercourse with JANE DOE, a
21 minor, not the spouse of the defendant, the minor being more than
22 three years younger than the defendant.
23
24
25
26
27
28

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

COUNT TEN

On or about May 30, 2019, in the County of SACRAMENTO, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code section 261.5(c), a felony, was committed by JAMES BRIAN RHODES, engaged in an act of unlawful sexual intercourse with JANE DOE, a minor, not the spouse of the defendant, the minor being more than three years younger than the defendant.

COUNT ELEVEN

On or about June 13, 2019, in the County of Placer and/or SACRAMENTO, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code section 261.5(c), a felony, was committed by JAMES BRIAN RHODES, engaged in an act of unlawful sexual intercourse with JANE DOE, a minor, not the spouse of the defendant, the minor being more than three years younger than the defendant.

COUNT TWELVE

On or about June 16, 2019, in the County of Placer, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code section 261.5(c), a felony, was committed by JAMES BRIAN RHODES, engaged in an act of unlawful sexual intercourse with JANE DOE, a minor, not

1 the spouse of the defendant, the minor being more than three years
2 younger than the defendant (at the defendant's home).

3
4 **COUNT THIRTEEN**

5
6 On or about June 16, 2019, in the County of Placer, the crime
7 of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code section
8 261.5(c), a felony, was committed by JAMES BRIAN RHODES, engaged in
9 an act of unlawful sexual intercourse with JANE DOE, a minor, not
10 the spouse of the defendant, the minor being more than three years
11 younger than the defendant (in the defendant's truck).

12
13
14 **COUNT FOURTEEN**

15
16
17 On or about June 17, 2019, in the County of SACRAMENTO, the
18 crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code
19 section 261.5(c), a felony, was committed by JAMES BRIAN RHODES,
20 engaged in an act of unlawful sexual intercourse with JANE DOE, a
21 minor, not the spouse of the defendant, the minor being more than
22 three years younger than the defendant.

COUNT FIFTEEN

1
2
3 On or about June 27, 2019, in the County of Placer and/or
4 SACRAMENTO, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation
5 of Penal Code section 261.5(c), a felony, was committed by JAMES
6 BRIAN RHODES, engaged in an act of unlawful sexual intercourse with
7 JANE DOE, a minor, not the spouse of the defendant, the minor being
8 more than three years younger than the defendant.
9

10
11 **COUNT SIXTEEN**

12
13 On or about July 3, 2019, in the County of Placer and/or
14 SACRAMENTO, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation
15 of Penal Code section 261.5(c), a felony, was committed by JAMES
16 BRIAN RHODES, engaged in an act of unlawful sexual intercourse with
17 JANE DOE, a minor, not the spouse of the defendant, the minor being
18 more than three years younger than the defendant.
19
20

21
22
23 **COUNT SEVENTEEN**

24
25 On or about July 5, 2019, in the County of Placer and/or
26 SACRAMENTO, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation
27 of Penal Code section 261.5(c), a felony, was committed by JAMES
28

1 BRIAN RHODES, engaged in an act of unlawful sexual intercourse with
2 JANE DOE, a minor, not the spouse of the defendant, the minor being
3 more than three years younger than the defendant.
4

5
6 **COUNT EIGHTEEN**
7

8
9 On or about July 22, 2019, in the County of SACRAMENTO, the
10 crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code
11 section 261.5(c), a felony, was committed by JAMES BRIAN RHODES,
12 engaged in an act of unlawful sexual intercourse with JANE DOE, a
13 minor, not the spouse of the defendant, the minor being more than
14 three years younger than the defendant.
15

16
17 **COUNT NINETEEN**
18

19 On or about July 25, 2019, in the County of SACRAMENTO, the
20 crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code
21 section 261.5(c), a felony, was committed by JAMES BRIAN RHODES,
22 engaged in an act of unlawful sexual intercourse with JANE DOE, a
23 minor, not the spouse of the defendant, the minor being more than
24 three years younger than the defendant.
25
26
27
28

COUNT TWENTY

1
2
3 On or about August 21, 2019, in the County of SACRAMENTO, the
4 crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code
5 section 261.5(c), a felony, was committed by JAMES BRIAN RHODES,
6 engaged in an act of unlawful sexual intercourse with JANE DOE, a
7 minor, not the spouse of the defendant, the minor being more than
8 three years younger than the defendant.
9

10
11 **COUNT TWENTY-ONE**

12
13 On or about August 22, 2019, in the County of Placer and/or
14 SACRAMENTO, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation
15 of Penal Code section 261.5(c), a felony, was committed by JAMES
16 BRIAN RHODES, engaged in an act of unlawful sexual intercourse with
17 JANE DOE, a minor, not the spouse of the defendant, the minor being
18 more than three years younger than the defendant.
19
20

21 **COUNT TWENTY-TWO**

22
23
24 On or about November 20, 2019, in the County of Placer and/or
25 SACRAMENTO, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation
26 of Penal Code section 261.5(c), a felony, was committed by JAMES
27 BRIAN RHODES, engaged in an act of unlawful sexual intercourse with
28

1 JANE DOE, a minor, not the spouse of the defendant, the minor being
2 more than three years younger than the defendant.

3
4 **COUNT TWENTY-THREE**

5
6 On or about December 4, 2019, in the County of SACRAMENTO, the
7 crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of Penal Code
8 section 261.5(c), a felony, was committed by JAMES BRIAN RHODES,
9 engaged in an act of unlawful sexual intercourse with JANE DOE, a
10 minor, not the spouse of the defendant, the minor being more than
11 three years younger than the defendant.
12

13
14 **COUNT TWENTY-FOUR**

15
16
17 On or about December 4, 2019, in the County of SACRAMENTO, the
18 crime of SODOMY OF PERSON UNDER 18, in violation of PENAL CODE
19 SECTION 286(b)(1), a felony, was committed by JAMES BRIAN RHODES,
20 who did unlawfully participate in an act of sodomy with JANE DOE, a
21 person under the age of eighteen years.
22

23
24 "NOTICE: Conviction of this offense will require you to
25 register pursuant to Penal Code Section 290. Registration pursuant
26 to Penal Code section 290 will be for the rest of your life. Willful
27 failure to register is a crime."
28

1 "NOTICE: Pursuant to the provisions of PC Section 293.5 the
2 use of pseudonym "Jane or John Doe", if it appears in the complaint
3 or information, is for purposes of protecting the privacy of the
4 alleged victim."
5

6
7
8 **JURISDICTION**

9
10 For counts 1-24, pursuant to Penal Code section 784.7(b) If more
11 than one violation of Section 243.4 , 261.5 , 273a , 273.5 , or
12 646.9 occurs in more than one jurisdictional territory, and the
13 defendant and the victim are the same for all of the offenses, the
14 jurisdiction of any of those offenses and for any offenses properly
15 joinable with that offense, is in any jurisdiction where at least
16 one of the offenses occurred.
17

18
19 Additionally for Counts 1-24, pursuant to Penal 783 when a public
20 offense is committed in this State, in a motor vehicle or on board a
21 vessel navigating a river, bay, slough, lake, or canal, or lying
22 therein, in the prosecution of its voyage, or on a railroad train or
23 car, motor vehicle, common carrier transporting passengers or on an
24 aircraft prosecuting its trip, the jurisdiction is in any competent
25 court, through, on, or over the jurisdictional territory of which
26 the vessel, train, car, motor vehicle, common carrier or aircraft
27
28

1 passes in the course of its voyage or trip, or in the jurisdictional
2 territory of which the voyage or trip terminates.
3
4
5
6

7 I declare under penalty of perjury that the foregoing is true
8 and correct. Executed on February 4, 2020, at Roseville, Placer
9 County, California.
10

11 JEFFREY WILSON, DISTRICT ATTORNEY (Acting)
12

13 By: Mariam Baxley
14 MARIAM BAXLEY,
15 DEPUTY DISTRICT ATTORNEY
16
17
18
19
20

21 **NOTICE.**

22 **PLEASE TAKE NOTICE THAT COUNSEL FOR THE PEOPLE HEREBY MAKE**
23 **AN INFORMAL DEMAND FOR DISCOVERY (PURSUANT TO PENAL CODE**
24 **SECTION 1054.3) WITHIN FIFTEEN DAYS.**
25
26
27
28