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10 Attorneys for Plaintiff

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN JOAQUIN  
12 STOCKTON BRANCH

13 THE PEOPLE OF THE STATE OF CALIFORNIA,

14 Plaintiff,

15 vs.

16 WESLEY BROWNLEE,

17 Defendant(s).

No. SP22-32459, SP22-28891,  
SP22-31727  
STOCKTON POLICE  
DEPARTMENT CASE  
DA Case: 0928095

Complaint No:  
202210180034

AMENDED COMPLAINT

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

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

21 On or about August 30, 2022 in the County of San Joaquin, California, WESLEY  
22 BROWNLEE did commit the crime of MURDER, in violation of Section 187(a) of the Penal  
23 Code, a FELONY, who at the time and place last aforesaid, did willfully and unlawfully and  
24 intentionally and with malice aforethought murder JONATHAN RODRIGUEZ  
25 HERNANDEZ, a human being. It is further alleged that the above offense is a serious felony  
26 within the meaning of Penal Code Section 1192.7(c)(1).  
27  
28

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

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

6  
7 **USE OF FIREARM IN COMMISSION OF FELONY PC12022.5(A)**

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

12  
13 **SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE MURDERS**

14 **PC190.2(A)(3)**

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

17  
18 For a further and separate cause of complaint, being a different offense from but connected in  
19 its commission with the charge(s) above, complainant further complains and says:

20  
21 **COUNT 2: Code Section PC 187(A) MURDER**

22 On or about September 21, 2022 in the County of San Joaquin, California, WESLEY  
23 BROWNLEE did commit the crime of MURDER, in violation of Section 187(a) of the Penal  
24 Code, a FELONY, who at the time and place last aforesaid, did willfully and unlawfully and  
25 intentionally and with malice aforethought murder JUAN CARLOS CARRANZA-CRUZ, a  
26 human being. It is further alleged that the above offense is a serious felony within the meaning  
27 of Penal Code Section 1192.7(c)(1).

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

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

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

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

11  
12 **SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE MURDERS**

13 **PC190.2(A)(3)**

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

16  
17 For a further and separate cause of complaint, being a different offense from but connected in  
18 its commission with the charge(s) above, complainant further complains and says:

19  
20 **COUNT 3: Code Section PC 187(A) MURDER**

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

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

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

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

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

11  
12 **SPECIAL CIRCUMSTANCE: CONVICTED OF MULTIPLE MURDERS**

13 **PC190.2(A)(3)**

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

16  
17 For a further and separate cause of complaint, being a different offense from but connected in  
18 its commission with the charge(s) above, complainant further complains and says:

19  
20 **COUNT 4: Code Section PC 29800(A)(1) FELON/ADDICT POSSESS/ETC FIREARM**

21 On or about October 14, 2022 in the County of San Joaquin, California, WESLEY  
22 BROWNLEE did commit the crime of FELON/ADDICT POSSESS/ETC FIREARM, in  
23 violation of Section 29800(a)(1) of the Penal Code, a FELONY, who at the time and place last  
24 aforesaid, did willfully and unlawfully own, purchase, receive or have in his possession or  
25 under his custody or control a firearm, to-wit: HANDGUN, and said defendant WESLEY  
26 BROWNLEE 1. having theretofore been duly and legally convicted of a felony or felonies, to-  
27 wit: the crime of POSSESSION OF COCAINE BASE FOR SALE in violation of Section

1 11351.5 of the HEALTH AND SAFETY Code on MARCH 2, 2015 by and before the  
2 SUPERIOR Court, County of San Joaquin State of California.

3  
4 For a further and separate cause of complaint, being a different offense from but connected in  
5 its commission with the charge(s) above, complainant further complains and says:

6  
7 **COUNT 5: Code Section PC 30305(A)(1) POSSESSION OF AMMUNITION**

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

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

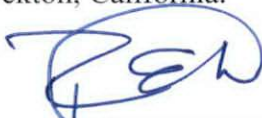
24  
25 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that the  
26 defendant and their attorney disclose to the People all information and materials described in  
27 Penal Code Section 1054.3.

1 I declare under penalty of perjury that the foregoing is true and correct except for those things  
2 stated on information and belief and those I believe to be true.

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4 Executed on October 17, 2022, at Stockton, California.

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ROBERT HIMELBLAU  
Chief Deputy District Attorney

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RH/rds

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