

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO  
CENTRAL DIVISION**

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,

v.

ALEXANDER AKRIDGEJACOBS,  
*dob 09/10/90*  
*aka ALEXANDER AKRIDGE-JACOBS;*

JESSE MEREL CANNON,  
*dob 06/08/90;*

AUSTIN JOSEPH,  
*dob 09/26/00*  
*aka JOSEPH AUSTIN GASKINS;*

BRIAN LIGHTFOOT,  
*dob 09/30/96;*

CHRISTIAN MARTINEZ,  
*dob 10/17/98;*

LUIS FRANCISCO MORA,  
*dob 08/03/91;*

BRYAN RIVERA,  
*dob 07/18/01;*

FARAZ MARTIN TALAB,  
*dob 08/12/94;*

JEREMY WHITE,  
*dob 10/07/82*  
*aka JEREMY JONATHAN ROSS WHITE;*

ERICH LOUIS YACH,  
*dob 01/07/84;*

Defendants

CT No. CD292607  
DA No. AEW194  
AMENDED  
COMPLAINT-FELONY

INFORMATION

Date: \_\_\_\_\_

## PC296 DNA TEST STATUS SUMMARY

Defendant	DNA Testing Requirements
AKRIDGEJACOBS, ALEXANDER	DNA sample required upon conviction
CANNON, JESSE MEREL	DNA sample has been previously provided
GASKINS, JOSEPH AUSTIN	DNA sample required upon conviction
LIGHTFOOT, BRIAN	DNA sample required upon conviction
MARTINEZ, CHRISTIAN	DNA sample required upon conviction
MORA, LUIS FRANCISCO	DNA sample required upon conviction
RIVERA, BRYAN	DNA sample required upon conviction
TALAB, FARAZ MARTIN	DNA sample required upon conviction
WHITE, JEREMY	DNA sample required upon conviction
YACH, ERICH LOUIS	DNA sample has been previously provided

## CHARGE SUMMARY

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
1	PC182(a)(1)	Felony	Check Code		
	AKRIDGEJACOBS, ALEXANDER				
	CANNON, JESSE MEREL				
	GASKINS, JOSEPH AUSTIN				
	LIGHTFOOT, BRIAN				
	MARTINEZ, CHRISTIAN				
	MORA, LUIS FRANCISCO				
	RIVERA, BRYAN				
	TALAB, FARAZ MARTIN				
	WHITE, JEREMY				
	YACH, ERICH LOUIS				
2	PC22810(g)(1)	Felony	16-2-3		
	LIGHTFOOT, BRIAN				
3	PC22810(g)(1)	Felony	16-2-3		
	MORA, LUIS FRANCISCO				
4	PC245(a)(4)	Felony	2-3-4		
	CANNON, JESSE MEREL				
	MORA, LUIS FRANCISCO				

## CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
4	PC245(a)(4) RIVERA, BRYAN YACH, ERICH LOUIS	Felony	2-3-4	PC1192.7(c)(8)	Serious
5	PC22810(g)(1) YACH, ERICH LOUIS	Felony	16-2-3		
6	PC22810(g)(1) YACH, ERICH LOUIS	Felony	16-2-3		
7	PC22810(g)(1) MORA, LUIS FRANCISCO TALAB, FARAZ MARTIN WHITE, JEREMY	Felony	16-2-3		
8	PC22810(g)(1) WHITE, JEREMY	Felony	16-2-3		
9	PC597(a) WHITE, JEREMY	Felony	16-2-3		
10	PC22810(g)(1) LIGHTFOOT, BRIAN	Felony	16-2-3		
11	PC22810(g)(1) LIGHTFOOT, BRIAN	Felony	16-2-3		
12	PC22810(g)(1) LIGHTFOOT, BRIAN	Felony	16-2-3		
13	PC22810(g)(1) LIGHTFOOT, BRIAN	Felony	16-2-3		
14	PC245(a)(1) AKRIDGEJACOBS, ALEXANDER CANNON, JESSE MEREL LIGHTFOOT, BRIAN	Felony	2-3-4		
15	PC245(a)(1) AKRIDGEJACOBS, ALEXANDER CANNON, JESSE MEREL LIGHTFOOT, BRIAN	Felony	2-3-4	PC1192.7(c)(23) PC1192.7(c)(23) PC1192.7(c)(23)	Serious Serious Serious

## CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
16	PC245(a)(1) CANNON, JESSE MEREL LIGHTFOOT, BRIAN TALAB, FARAZ MARTIN WHITE, JEREMY YACH, ERICH LOUIS	Felony	2-3-4	PC1192.7(c)(23)	Serious
17	PC244.5(b) YACH, ERICH LOUIS	Felony	16-2-3		
18	PC594(a)(b)(2)(A) TALAB, FARAZ MARTIN	Misdemeanor	1 Yr/\$1000		
19	PC22810(g)(1) YACH, ERICH LOUIS	Felony	16-2-3		
20	PC22810(g)(1) TALAB, FARAZ MARTIN	Felony	16-2-3		
21	PC22810(g)(1) LIGHTFOOT, BRIAN	Felony	16-2-3		
22	PC245(a)(1) GASKINS, JOSEPH AUSTIN MARTINEZ, CHRISTIAN	Felony	2-3-4		
23	PC22810(g)(1) MARTINEZ, CHRISTIAN MORA, LUIS FRANCISCO RIVERA, BRYAN TALAB, FARAZ MARTIN	Felony	16-2-3		
24	PC22810(g)(2) MORA, LUIS FRANCISCO	Felony	16-2-3		
	PC1054.3			INFORMAL REQUEST FOR DISCOVERY	

The undersigned, certifying upon information and belief, complains that in the County of San Diego, State of California, the Defendant(s) did commit the following crime(s):

## CHARGES

### COUNT 1 - CONSPIRACY TO COMMIT A CRIME

On or about January 9, 2021, ALEXANDER AKRIDGEJACOBS, JESSE MEREL CANNON, AUSTIN JOSEPH, BRIAN LIGHTFOOT, CHRISTIAN MARTINEZ, LUIS FRANCISCO MORA, BRYAN RIVERA, FARAZ MARTIN TALAB, JEREMY WHITE, and ERICH LOUIS YACH did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Penal Code Section 404 Riot, in violation of PENAL CODE SECTION 182(a)(1).

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

The Defendants are alleged to be affiliated with ANTIFA and are organized into two groups, one originating from Los Angeles and the other from San Diego. ANTIFA is known to use force, fear, and violence to further their own interests and to suppress the interests of others. This tactic is referred to as “Direct Action” and is known to mean acts of violence such as assault, battery, assault with deadly weapons, arson, and vandalism. The alleged object of this conspiracy was to incite and participate in a riot using direct action tactics.

On or about January 2nd, 2021, ANTIFA supporters posted on social media calling for “counterprotesting” and direct action, in response to a scheduled political demonstration at Pacific Beach on January 9th, 2021. People pledged their support and participation by liking and sharing the post, in essence agreeing to take part in the “direct action”. Others agreed by showing up in Pacific Beach on January 9th, 2021 and participating in the violence detailed below.

#### Overt Acts

Overt Act 1. On or about January 9th, 2021, Brian Lightfoot put on black colored clothing.

Overt Act 2. On or about January 9th, 2021, Christian Martinez put on black colored clothing

Overt Act 3. On or about January 9th, 2021, Martin Talab gathers colored black clothing

Overt Act 4. On or about January 9th, 2021, Bryan Rivera put on black colored clothing.

Overt Act 5. On or about January 9th, 2021, Luis Francisco Mora put on black clothing

Overt Act 6. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator drove the Los Angeles faction of the protest to Pacific Beach

Overt Act 7. On or about January 9th, 2021, Jesse Cannon put on black colored clothing.

Overt Act 8. On or about January 9th, 2021, Jeremy White put on black colored clothing.

Overt Act 9. On or about January 9th, 2021, Alexander Akridge-Jacobs put on black clothing.

Overt Act 10. On or about January 9th, 2021, Jonah Bigel gathers black colored clothing.

Overt Act 11. On or about January 9th, 2021, Erich Yach put on and wore black jeans a black cut off shirt and a red flannel jacket with pro antifa patches.

Overt Act 12. On or about January 9th, 2021, Joseph Gaskins put on black colored clothing.

Overt Act 13. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator met in Pacific Beach, San Diego County

#### ATTACK 1

Overt Act 14. On or about January 9th, 2021, Brian Lightfoot initiated an attack by spraying a unnamed victim with mace.

Overt Act 15. On or about January 9th, 2021, Luis Mora sprayed an unnamed victim with mace

## CHARGES (cont'd)

Overt Act 16. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator attacked a unnamed victim using impact weapons, or mace, or fists, or feet.

Overt Act 17. On or about January 9th, 2021 one or more of the charged Defendants and or an unidentified coconspirator attack two unnamed victims with mace or closed fists or feet, or blunt force objects

### ATTACK 2

Overt Act 18. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator attempt to instigate a confrontation with an unnamed victim as he tried to walk his dog down the boardwalk.

Overt Act 19. On or about January 9th, 2021, Jeremy White sprayed unnamed victim and his dog with mace.

### ATTACK 3

Overt Act 20. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator surround a unnamed victim preventing flight or freedom of movement.

Overt Act 21. On or about January 9th, 2021, Unknown coconspirator sprays a unnamed victim with mace.

### ATTACK 4

Overt Act 22. On or about January 9th, 2021, Jesse Cannon points out four unnamed victims for attack.

Overt Act 23. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator surround the four unnamed victims.

Overt Act 24. On or about January 9th, 2021, Brian Lightfoot initiates attack and sprayed the four unnamed victims with mace.

Overt Act 25. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator sprayed one of the four unknown victims in the face with mace.

Overt Act 26. On or about January 9th, 2021, Brian Lightfoot shoved an unnamed victim in the back.

Overt Act 27. On or about January 9th, 2021, Jesse Cannon threw a wooden lawn chair at two of the four unnamed victims.

Overt Act 28. On or about January 9th, 2021, Brian Lightfoot shoved an unnamed victim to the ground.

Overt Act 29. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator struck at an unnamed victim with a flagpole.

Overt Act 30. On or about January 9th, 2021 one or more of the charged Defendants and or an unidentified coconspirator struck at an unnamed victim with wooden walking stick.

Overt Act 31. On or about January 9th, 2021, Jesse Cannon threw a glass beer bottle at an unnamed victim.

Overt Act 32. On or about January 9th, 2021, Alexander Akeridge-Jacobs threw a can of twisted tea into one of the unnamed victim's back

Overt Act 33. On or about January 9th, 2021, Jesse Cannon threw can of twisted tea into the back of one of the unnamed victims.

Overt Act 34. On or about January 9th, 2021, Jonah Bigel struck an unnamed victim with a baseball bat.

Overt Act 35. On or about January 9th, 2021, Brian Lightfoot threw multiple closed fist strikes towards back of an unnamed victim's head while wearing reinforced Kevlar gloves.

Overt Act 36. On or about January 9th, 2021, Unknown Coconspirator threw several punches into unnamed victim's body.

Overt Act 37. On or about January 9th, 2021, Unknown coconspirator sprayed an unnamed victim with mace.

Overt Act 38. On or about January 9th, 2021, Brian Lightfoot kicked unnamed victim in his groin.

## CHARGES (cont'd)

Overt Act 39. On or about January 9th, 2021, Brian Lightfoot kicked unnamed victim in the back.

Overt Act 40. On or about January 9th, 2021, Bryan Rivera and one or more of the charged Defendants and or an unidentified coconspirators chased the four unnamed victims up the street.

### ATTACK 5

Overt Act 41. On or about January 9th, 2021, Jeremy White singled out an unnamed victim for attack.

Overt Act 42. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator coordinate to attack an unnamed victim

Overt Act 43. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator surround an unnamed victim preventing freedom of movement and or escape

Overt Act 44. On or about January 9th, 2021, Jesse Cannon Initiates the attack and shoved an unnamed victim from his bicycle to the ground.

Overt Act 45. On or about January 9th, 2021, Brian Lightfoot attempted to stomp on an unnamed victim's head as he is on the ground

Overt Act 46. On or about January 9th, 2021, An unknown coconspirator attacked an unnamed victim with a skateboard swung at his head.

Overt Act 47. On or about January 9th, 2021, Erich Yach used a taser against an unnamed victim.

Overt Act 48. On or about January 9th, 2021, Farah Martin Talab took an unnamed victim's bike.

Overt Act 49. On or about January 9th, 2021, Erich Yach and Unknown Conspirator use mace against two unnamed victims.

Overt Act 50. On or about January 9th, 2021, An unknown coconspirator handed Brian Lightfoot wooden walking stick to be used as a weapon.

Overt Act 51. On or about January 9th, 2021, Brian Lightfoot ran up behind the fleeing unnamed victims, and struck unnamed victim in the back with the wooden walking stick.

Overt Act 52. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator attempted to spray the unnamed victims with mace.

Overt Act 53. On or about January 9th, 2021, Jonah Bigel uses a baseball bat to vandalize the Sketchers store front window.

### ATTACK 6

Overt Act 54. On or about January 9th, 2021, Brian Lightfoot, Christian Martinez, Alexander Akridge Jacobs, and other Unknown coconspirators surround unnamed victim.

Overt Act 55. On or about January 9th, 2021, two unknown coconspirators open umbrellas blocking unnamed victim's escape and obstructing observation of the attack

Overt Act 56. On or about January 9th, 2021, Brian Lightfoot sprayed unnamed victim in the face with mace

### ATTACK 7

Overt Act 57. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator initiate a group beat down of an unnamed victim.

Overt Act 58. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator punches unnamed victim in the back of the head

Overt Act 59. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator throw unnamed victim to the ground

## **CHARGES (cont'd)**

Overt Act 60. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator assaulted unnamed victim with fists and feet

Overt Act 61. On or about January 9th, 2021, Joseph Gaskins assaulted unnamed victim with a skateboard

Overt Act 62. On or about January 9th, 2021, Christian Martinez threw a full twisted tea can at unnamed victim's head.

### **ATTACK 8**

Overt Act 63. On or about January 9th, 2021, Martin Talab initiated the attack by pushing at an unnamed victim's midsection

Overt Act 64. On or about January 9th, 2021, Brian Rivera grabbed an unnamed victim and delivered a knee strike

Overt Act 65. On or about January 9th, 2021, Louis Mora struck an unnamed victim

Overt Act 66. On or about January 9th, 2021, Christian Martinez sprayed unnamed with mace

### **Attacks on Police**

Overt Act 67. On or about January 9th, 2021, one or more unknown coconspirators threw various objects including a glass bottle at police officers

Overt Act 68. On or about January 9th, 2021, one or more of the charged Defendants and or an unidentified coconspirator attempted to spray several police officers with mace.

## **COUNT 2 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN LIGHTFOOT did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

## **COUNT 3 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, LUIS FRANCISCO MORA did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

## **COUNT 4 - ASSAULT BY MEANS LIKELY TO PRODUCE GREAT BODILY INJURY**

On or about January 9, 2021, JESSE MEREL CANNON, LUIS FRANCISCO MORA, BRYAN RIVERA, and ERICH LOUIS YACH did unlawfully commit an assault upon Another by means of force likely to produce great bodily injury, in violation of PENAL CODE SECTION 245(a)(4).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, BRYAN RIVERA, personally inflicted great bodily injury upon Another, not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 1192.7(c)(8).



## **CHARGES (cont'd)**

### **COUNT 5 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, ERICH LOUIS YACH did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 6 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, ERICH LOUIS YACH did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 7 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, LUIS FRANCISCO MORA, FARAZ MARTIN TALAB, and JEREMY WHITE did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 8 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, JEREMY WHITE did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 9 - ANIMAL CRUELTY**

On or about January 9, 2021, JEREMY WHITE did maliciously and intentionally maim, mutilate, torture, wound and kill an animal in violation of PENAL CODE SECTION 597(a).

### **COUNT 10 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN LIGHTFOOT did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 11 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN LIGHTFOOT did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

## **CHARGES (cont'd)**

### **COUNT 12 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN LIGHTFOOT did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 13 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN LIGHTFOOT did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 14 - ASSAULT WITH DEADLY WEAPON**

On or about January 9, 2021, ALEXANDER AKRIDGEJACOBS, JESSE MEREL CANNON, and BRIAN LIGHTFOOT did unlawfully commit an assault upon Another with a deadly weapon and instrument, in violation of PENAL CODE SECTION 245(a)(1).

### **COUNT 15 - ASSAULT WITH DEADLY WEAPON**

On or about January 9, 2021, ALEXANDER AKRIDGEJACOBS did unlawfully commit an assault upon Another with a deadly weapon and instrument, in violation of PENAL CODE SECTION 245(a)(1).

### **COUNT 16 - ASSAULT WITH DEADLY WEAPON**

On or about January 9, 2021, JESSE MEREL CANNON, BRIAN LIGHTFOOT, FARAZ MARTIN TALAB, JEREMY WHITE, and ERICH LOUIS YACH did unlawfully commit an assault upon Another with a deadly weapon and instrument, in violation of PENAL CODE SECTION 245(a)(1).

### **COUNT 17 - ASSAULT WITH STUN GUN OR LESS LETHAL WEAPON**

On or about January 9, 2021, ERICH LOUIS YACH did unlawfully assault Another with a stun gun and less lethal weapon as defined in Penal Code section 12601, in violation of PENAL CODE SECTION 244.5(b).

### **COUNT 18 - VANDALISM UNDER \$400**

On or about January 9, 2021, FARAZ MARTIN TALAB did unlawfully and maliciously damage and destroy real and personal property not his or her own, and the amount of defacement, damage, and destruction was less than four hundred dollars (\$400), in violation of PENAL CODE SECTION 594(a)(b)(2)(A).

## **CHARGES (cont'd)**

### **COUNT 19 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, ERICH LOUIS YACH did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 20 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, FARAZ MARTIN TALAB did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 21 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN LIGHTFOOT did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 22 - ASSAULT WITH DEADLY WEAPON**

On or about January 9, 2021, AUSTIN JOSEPH and CHRISTIAN MARTINEZ did unlawfully commit an assault upon Another with a deadly weapon and instrument, in violation of PENAL CODE SECTION 245(a)(1).

### **COUNT 23 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, CHRISTIAN MARTINEZ, LUIS FRANCISCO MORA, BRYAN RIVERA, and FARAZ MARTIN TALAB did unlawfully use tear gas and a tear gas weapon, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 24 - USE OF TEAR GAS AGAINST PEACE OFFICER**

On or about January 9, 2021, LUIS FRANCISCO MORA did unlawfully use tear gas and a tear gas weapon against a peace officer who was then and there engaged in the performance of his/her official duties and the defendant knew and should have reasonably known he/she was so engaged, in violation of PENAL CODE SECTION 22810(g)(2).



NOTICE: Any defendant named on this complaint who is on criminal probation in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's probation, on any and all such probation grants, utilizing the same evidence, at the preliminary hearing. Defenses to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

NOTICE: Any defendant named on this complaint who is on Mandatory Supervision in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's Mandatory Supervision pursuant to Penal Code Sections 1170(h)(5)(B) and 1203.2, on any and all such grants, utilizing the same evidence, at the preliminary hearing. Defense to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

Pursuant to PENAL CODE SECTION 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by PENAL CODE SECTION 1054.3.

Sheriff's records indicate that as of the booking date one or more defendants have not yet provided a DNA sample to the DOJ database. Pursuant to Penal Code Section 296(e), the court shall order collection of DNA from the defendant(s) if advised by the prosecuting attorney that a sample is required but has not been provided by the defendant. Pursuant to Penal Code sections 296/296.1, if not already required from a past conviction, any defendants who have not done so will be required to provide a sample upon conviction of this felony offense.

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant BRIAN LIGHTFOOT in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant ALEXANDER AKRIDGEJACOBS in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant JESSE MEREL CANNON in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant FARAZ MARTIN TALAB in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant JEREMY WHITE in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER CD292607, CONSISTS OF 24 COUNTS.

Executed at City of San Diego, County of San Diego, State of California, on December 6, 2021.

\_\_\_\_\_  
COMPLAINANT



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INFORMATION

SUMMER STEPHAN  
District Attorney  
County of San Diego  
State of California  
by:

\_\_\_\_\_  
Date

\_\_\_\_\_  
Deputy District Attorney