

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

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| THE PEOPLE OF THE STATE OF CALIFORNIA, <p style="text-align: center;">v.</p> JASMIN PARORE, <i>dob 02/25/01;</i> | Plaintiff, Defendant |
|--|---------------------------------|

CT No. CD287554
 DA No. AER782
 AMENDED
 COMPLAINT-FELONY

INFORMATION

Date: _____

PC296 DNA TEST STATUS SUMMARY

Defendant

DNA Testing Requirements

PARORE, JASMIN

DNA sample required upon conviction

CHARGE SUMMARY

| Count | Charge | Issue Type | Sentence Range | Special Allegations | Allegation Effect |
|-------|-------------------------------|------------|------------------|---------------------|-------------------|
| 1 | PC211 PARORE, JASMIN | Felony | 3-4-6 | PC212.5(a) | |
| 2 | PC368(d) PARORE, JASMIN | Felony | 2-3-4/\$10,000 | | |
| 3 | PC496(a) PARORE, JASMIN | Felony | 16-2-3 | | |
| 4 | PC186.10(a) PARORE, JASMIN | Felony | 16-2-3/\$250,000 | | |
| 5 | PC211 PARORE, JASMIN | Felony | 3-4-6 | PC212.5(a) | |
| 6 | PC368(d) PARORE, JASMIN | Felony | 2-3-4/\$10,000 | | |
| 7 | PC496(a) PARORE, JASMIN | Felony | 16-2-3 | | |

CHARGE SUMMARY (cont'd)

| Count | Charge | Issue Type | Sentence Range | Special Allegations | Allegation Effect |
|-------|-------------------------------|------------|------------------|---------------------|-------------------|
| 8 | PC186.10(a) PARORE, JASMIN | Felony | 16-2-3/\$250,000 | | |
| 9 | PC368(d) PARORE, JASMIN | Felony | 2-3-4/\$10,000 | | |
| 10 | PC496(a) PARORE, JASMIN | Felony | 16-2-3 | | |
| 11 | PC186.10(a) PARORE, JASMIN | Felony | 16-2-3/\$250,000 | | |
| 12 | PC368(d) PARORE, JASMIN | Felony | 2-3-4/\$10,000 | | |
| 13 | PC496(a) PARORE, JASMIN | Felony | 16-2-3 | | |
| 14 | PC186.10(a) PARORE, JASMIN | Felony | 16-2-3/\$250,000 | | |
| 15 | PC211 PARORE, JASMIN | Felony | 3-4-6 | | PC212.5(a) |
| 16 | PC368(d) PARORE, JASMIN | Felony | 2-3-4/\$10,000 | | |
| 17 | PC496(a) PARORE, JASMIN | Felony | 16-2-3 | | |
| 18 | PC186.10(a) PARORE, JASMIN | Felony | 16-2-3/\$250,000 | | |
| 19 | PC368(d) PARORE, JASMIN | Felony | 2-3-4/\$10,000 | | |
| 20 | PC496(a) PARORE, JASMIN | Felony | 16-2-3 | | |
| 21 | PC186.10(a) PARORE, JASMIN | Felony | 16-2-3/\$250,000 | | |
| 22 | PC211 PARORE, JASMIN | Felony | 2-3-5 | | |
| 23 | PC368(d) PARORE, JASMIN | Felony | 2-3-4/\$10,000 | | |

CHARGE SUMMARY (cont'd)

| Count | Charge | Issue Type | Sentence Range | Special Allegations | Allegation Effect |
|-------|-------------------------------|------------|--------------------------------|---------------------|-------------------|
| 24 | PC496(a) PARORE, JASMIN | Felony | 16-2-3 | | |
| 25 | PC186.10(a) PARORE, JASMIN | Felony | 16-2-3/\$250,000 | | |
| 26 | PC211 PARORE, JASMIN | Felony | 2-3-5 | | |
| 27 | PC368(d) PARORE, JASMIN | Felony | 2-3-4/\$10,000 | | |
| 28 | PC496(a) PARORE, JASMIN | Felony | 16-2-3 | | |
| 29 | PC186.10(a) PARORE, JASMIN | Felony | 16-2-3/\$250,000 | | |
| 30 | PC211 PARORE, JASMIN | Felony | 3-4-6 | PC212.5(a) | |
| 31 | PC368(d) PARORE, JASMIN | Felony | 2-3-4/\$10,000 | | |
| 32 | PC496(a) PARORE, JASMIN | Felony | 16-2-3 | | |
| 33 | PC186.10(a) PARORE, JASMIN | Felony | 16-2-3/\$250,000 | | |
| | 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 - ROBBERY, FIRST DEGREE

On or about May 19, 2020, JASMIN PARORE did unlawfully and by means of force and fear take personal property from the person, possession and immediate presence of JUDITH & RONALD ATTIG, in violation of PENAL CODE SECTION 211.

CHARGES (cont'd)

And it is further alleged that the above offense was perpetrated in an inhabited dwelling house, making the offense Robbery in the first degree, within the meaning of PENAL CODE SECTION 212.5(a).

COUNT 2 - THEFT FROM ELDER (OVER \$950)

On or about May 19, 2020, JASMIN PARORE, did unlawfully violate a provision of law proscribing theft, forgery, and fraud of an elder, JUDITH & RONALD ATTIG, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 3 - RECEIVING STOLEN PROPERTY

On or about May 19, 2020, JASMIN PARORE did unlawfully buy, receive, conceal, sell, and withhold the property of JUDITH & RONALD ATTIG, a value in excess of Nine Hundred Fifty Dollars (\$950), which had been stolen, knowing such property to be stolen, in violation of PENAL CODE SECTION 496(a).

COUNT 4 - MONEY LAUNDERING

On or about May 19, 2020, JASMIN PARORE did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument of a value exceeding five thousand dollars (\$5,000) through one or more financial institutions, with the specific intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of criminal activity and knowing that the monetary instrument represents the proceeds of and is derived directly or indirectly from the proceeds of criminal activity, in violation of PENAL CODE SECTION 186.10(a).

COUNT 5 - ROBBERY, FIRST DEGREE

On or about May 27, 2020, JASMIN PARORE did unlawfully and by means of force and fear take personal property from the person, possession and immediate presence of MARILYN & KENNETH BENTLEY, in violation of PENAL CODE SECTION 211.

And it is further alleged that the above offense was perpetrated in an inhabited dwelling house, making the offense Robbery in the first degree, within the meaning of PENAL CODE SECTION 212.5(a).

CHARGES (cont'd)

COUNT 6 - THEFT FROM ELDER (OVER \$950)

On or about May 27, 2020, JASMIN PARORE, did unlawfully violate a provision of law proscribing theft, forgery, and fraud of an elder, MARILYN & KENNETH BENTLEY, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 7 - RECEIVING STOLEN PROPERTY

On or about May 27, 2020, JASMIN PARORE did unlawfully buy, receive, conceal, sell, and withhold the property of MARILYN & KENNETH BENTLEY, a value in excess of Nine Hundred Fifty Dollars (\$950), which had been stolen, knowing such property to be stolen, in violation of PENAL CODE SECTION 496(a).

COUNT 8 - MONEY LAUNDERING

On or about May 27, 2020, JASMIN PARORE did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument of a value exceeding five thousand dollars (\$5,000) through one or more financial institutions, with the specific intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of criminal activity and knowing that the monetary instrument represents the proceeds of and is derived directly or indirectly from the proceeds of criminal activity, in violation of PENAL CODE SECTION 186.10(a).

COUNT 9 - THEFT FROM ELDER (OVER \$950)

On or about June 9, 2020, JASMIN PARORE, did unlawfully violate a provision of law proscribing theft, forgery, and fraud of an elder, SUSAN DONALD, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 10 - RECEIVING STOLEN PROPERTY

On or about June 9, 2020, JASMIN PARORE did unlawfully buy, receive, conceal, sell, and withhold the property of SUSAN DONALD, a value in excess of Nine Hundred Fifty Dollars (\$950), which had been stolen, knowing such property to be stolen, in violation of PENAL CODE SECTION 496(a).

CHARGES (cont'd)

COUNT 11 - MONEY LAUNDERING

On or about June 9, 2020, JASMIN PARORE did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument of a value exceeding five thousand dollars (\$5,000) through one or more financial institutions, with the specific intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of criminal activity and knowing that the monetary instrument represents the proceeds of and is derived directly or indirectly from the proceeds of criminal activity, in violation of PENAL CODE SECTION 186.10(a).

COUNT 12 - THEFT FROM ELDER (OVER \$950)

On or about May 11, 2020, JASMIN PARORE, did unlawfully violate a provision of law proscribing theft, forgery, and fraud of an elder, JOAN DURKEE, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 13 - RECEIVING STOLEN PROPERTY

On or about May 11, 2020, JASMIN PARORE did unlawfully buy, receive, conceal, sell, and withhold the property of JOAN DURKEE, a value in excess of Nine Hundred Fifty Dollars (\$950), which had been stolen, knowing such property to be stolen, in violation of PENAL CODE SECTION 496(a).

COUNT 14 - MONEY LAUNDERING

On or about May 11, 2020, JASMIN PARORE did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument of a value exceeding five thousand dollars (\$5,000) through one or more financial institutions, with the specific intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of criminal activity and knowing that the monetary instrument represents the proceeds of and is derived directly or indirectly from the proceeds of criminal activity, in violation of PENAL CODE SECTION 186.10(a).

COUNT 15 - ROBBERY, FIRST DEGREE

On or about May 7, 2020, JASMIN PARORE did unlawfully and by means of force and fear take personal property from the person, possession and immediate presence of JERRY GOODMAN, in violation of PENAL CODE SECTION 211.

And it is further alleged that the above offense was perpetrated in an inhabited dwelling house, making the offense Robbery in the first degree, within the meaning of PENAL CODE SECTION 212.5(a).

CHARGES (cont'd)

COUNT 16 - THEFT FROM ELDER (OVER \$950)

On or about May 7, 2020, JASMIN PARORE, did unlawfully violate a provision of law proscribing theft, forgery, and fraud of an elder, JERRY GOODMAN, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 17 - RECEIVING STOLEN PROPERTY

On or about May 7, 2020, JASMIN PARORE did unlawfully buy, receive, conceal, sell, and withhold the property of JERRY GOODMAN, a value in excess of Nine Hundred Fifty Dollars (\$950), which had been stolen, knowing such property to be stolen, in violation of PENAL CODE SECTION 496(a).

COUNT 18 - MONEY LAUNDERING

On or about May 7, 2020, JASMIN PARORE did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument of a value exceeding five thousand dollars (\$5,000) through one or more financial institutions, with the specific intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of criminal activity and knowing that the monetary instrument represents the proceeds of and is derived directly or indirectly from the proceeds of criminal activity, in violation of PENAL CODE SECTION 186.10(a).

COUNT 19 - THEFT FROM ELDER (OVER \$950)

On or about May 28, 2020, JASMIN PARORE, did unlawfully violate a provision of law proscribing theft, forgery, and fraud of an elder, JEANNE BARNADE, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 20 - RECEIVING STOLEN PROPERTY

On or about May 28, 2020, JASMIN PARORE did unlawfully buy, receive, conceal, sell, and withhold the property of JEANNE BARNADE, a value in excess of Nine Hundred Fifty Dollars (\$950), which had been stolen, knowing such property to be stolen, in violation of PENAL CODE SECTION 496(a).

CHARGES (cont'd)

COUNT 21 - MONEY LAUNDERING

On or about May 28, 2020, JASMIN PARORE did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument of a value exceeding five thousand dollars (\$5,000) through one or more financial institutions, with the specific intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of criminal activity and knowing that the monetary instrument represents the proceeds of and is derived directly or indirectly from the proceeds of criminal activity, in violation of PENAL CODE SECTION 186.10(a).

COUNT 22 - ROBBERY

On or about May 7, 2020, JASMIN PARORE did unlawfully and by means of force and fear take personal property from the person, possession and immediate presence of CECELIA TRIMBLE, in violation of PENAL CODE SECTION 211.

COUNT 23 - THEFT FROM ELDER (OVER \$950)

On or about May 7, 2020, JASMIN PARORE, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, and fraud of an elder, CECELIA TRIMBLE, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 24 - RECEIVING STOLEN PROPERTY

On or about May 7, 2020, JASMIN PARORE did unlawfully buy, receive, conceal, sell, and withhold the property of CECELIA TRIMBLE, a value in excess of Nine Hundred Fifty Dollars (\$950), which had been stolen, knowing such property to be stolen, in violation of PENAL CODE SECTION 496(a).

COUNT 25 - MONEY LAUNDERING

On or about May 7, 2020, JASMIN PARORE did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument of a value exceeding five thousand dollars (\$5,000) through one or more financial institutions, with the specific intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of criminal activity and knowing that the monetary instrument represents the proceeds of and is derived directly or indirectly from the proceeds of criminal activity, in violation of PENAL CODE SECTION 186.10(a).

CHARGES (cont'd)

COUNT 26 - ROBBERY

On or about May 20, 2020, JASMIN PARORE did unlawfully and by means of force and fear take personal property from the person, possession and immediate presence of DALE PLASCH, in violation of PENAL CODE SECTION 211.

COUNT 27 - THEFT FROM ELDER (OVER \$950)

On or about May 20, 2020, JASMIN PARORE, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, and fraud of an elder, DALE PLASCH, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 28 - RECEIVING STOLEN PROPERTY

On or about May 20, 2020, JASMIN PARORE did unlawfully buy, receive, conceal, sell, and withhold the property of DALE PLASCH, a value in excess of Nine Hundred Fifty Dollars (\$950), which had been stolen, knowing such property to be stolen, in violation of PENAL CODE SECTION 496(a).

COUNT 29 - MONEY LAUNDERING

On or about May 20, 2020, JASMIN PARORE did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument of a value exceeding five thousand dollars (\$5,000) through one or more financial institutions, with the specific intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of criminal activity and knowing that the monetary instrument represents the proceeds of and is derived directly or indirectly from the proceeds of criminal activity, in violation of PENAL CODE SECTION 186.10(a).

COUNT 30 - ROBBERY, FIRST DEGREE

On or about June 9, 2020, JASMIN PARORE did unlawfully and by means of force and fear take personal property from the person, possession and immediate presence of VELMA & MICHAEL RUSSO, in violation of PENAL CODE SECTION 211.

And it is further alleged that the above offense was perpetrated in an inhabited dwelling house, making the offense Robbery in the first degree, within the meaning of PENAL CODE SECTION 212.5(a).

CHARGES (cont'd)

COUNT 31 - THEFT FROM ELDER (OVER \$950)

On or about June 9, 2020, JASMIN PARORE, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, and fraud of an elder, VELMA & MICHAEL RUSSO, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 32 - RECEIVING STOLEN PROPERTY

On or about June 9, 2020, JASMIN PARORE did unlawfully buy, receive, conceal, sell, and withhold the property of VELMA & MICHAEL RUSSO, a value in excess of Nine Hundred Fifty Dollars (\$950), which had been stolen, knowing such property to be stolen, in violation of PENAL CODE SECTION 496(a).

COUNT 33 - MONEY LAUNDERING

On or about June 9, 2020, JASMIN PARORE did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument of a value exceeding five thousand dollars (\$5,000) through one or more financial institutions, with the specific intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of criminal activity and knowing that the monetary instrument represents the proceeds of and is derived directly or indirectly from the proceeds of criminal activity, in violation of PENAL CODE SECTION 186.10(a).

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 JASMIN PARORE 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 CD287554, CONSISTS OF 33 COUNTS.

Executed at City of San Diego, County of San Diego, State of California, on January 28, 2021.

SCOTT
PIRRELLO

Digitally signed by SCOTT
PIRRELLO
Date: 2021.02.08 08:24:47
-08'00'

COMPLAINANT

INFORMATION

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

Date

Deputy District Attorney