

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
SAN BERNARDINO JUSTICE CENTER DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)
)
) Plaintiff)
))
 vs.)
))
 Erdem Gorgulu) FELONY COMPLAINT)
))
))
) Defendant) DA CASE NO 2020-00-0030280)
_____)

The undersigned is informed and believes that:

COUNT 1

On or about June 1, 2020, in the above named judicial district, the crime of ASSAULT WITH A DEADLY WEAPON, in violation of PENAL CODE SECTION 245(a)(1), a felony, was committed by Erdem Gorgulu, who did willfully and unlawfully commit an assault upon Juan Martinez, with a deadly weapon, to wit, Baseball Bat.

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

COUNT 2

On or about June 1, 2020, in the above named judicial district, the crime of ASSAULT BY A PUBLIC OFFICER, in violation of PENAL CODE SECTION 149, a felony, was committed by Erdem Gorgulu, who assaulted and beat Juan Martinez under color of authority, the defendant being then and there a public officer, to wit, Deputy Sheriff.

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COUNT 3

On or about June 1, 2020, in the above named judicial district, the crime of FILING A FALSE REPORT, in violation of PENAL CODE SECTION 118.1, a misdemeanor, was committed by Erdem Gorgulu, who did, as a peace officer, file a report regarding the commission and investigation of a crime with the agency which employed the defendant, and knowingly and intentionally included a statement and statements regarding a material matter which the defendant knew to be false.

COUNT 4

On or about June 1, 2020, in the above named judicial district, the crime of LOOTING, PETTY THEFT, in violation of PENAL CODE SECTION 463(c), a misdemeanor, was committed by Erdem Gorgulu, who did unlawfully take possession of property as defined in Penal Code section 488, and owned by Big 5, without consent and with the intent to deprive the owner permanently/remove it from the owner or the owner's agent's possession for so extended a period of time that the owner would be deprived of a major portion of the value of enjoyment of the property, and kept and moved that property, no matter how briefly, during a state of emergency as defined in Penal Code sections 463(d)(1) and (d)(3)/local emergency as defined in Penal Code sections 463(d)(2) and (d)(3)/evacuation order as defined by Penal Code section 463(d)(4).

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NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5.(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section

1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 4 COUNT(S).

Executed at San Bernardino, California, on August 26, 2020.

Bruce Brown

Bruce Brown
Chief Deputy District Attorney
DECLARANT AND COMPLAINANT

Agency: SB Sheriff CAC Division

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Erdem Gorgulu	08/21/1974			

Gang