

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)
)
) Plaintiff)
)
) vs.)
)
 Eric Otto White) FELONY COMPLAINT
)
)
) Defendant) DA CASE NO 2020-00-0041611

The undersigned is informed and believes that:

COUNT 1

On or about August 26, 2020, in the above named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Eric Otto White, who did unlawfully, and with malice aforethought murder **Kavina Madison Brooks**, a human being.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

It is further alleged as to count(s) 1, 2, 3 that said defendant(s) Eric Otto White personally and intentionally discharged a firearm, a handgun, which proximately caused great bodily injury and death to Kavina Madison Brooks within the meaning of Penal Code section 12022.53(d).

It is further alleged as to count(s) 1, 2, 3 that said defendant(s) Eric Otto White personally and intentionally discharged a firearm, a handgun, within the meaning of Penal Code section 12022.53(c).

It is further alleged as to count(s) 1, 2, 3 that said defendant(s) Eric Otto White personally used a firearm, a handgun, within the meaning of Penal Code section 12022.53(b).

COUNT 2

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On or about August 26, 2020, in the above named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Eric Otto White, who did unlawfully, and with malice aforethought murder **Kenneth Lee**, a human being.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

It is further alleged as to count(s) 1, 2, 3 that said defendant(s) Eric Otto White personally and intentionally discharged a firearm, a handgun, which proximately caused great bodily injury and death to Kenneth Lee within the meaning of Penal Code section 12022.53(d).

It is further alleged as to count(s) 1, 2, 3 that said defendant(s) Eric Otto White personally and intentionally discharged a firearm, a handgun, within the meaning of Penal Code section 12022.53(c).

It is further alleged as to count(s) 1, 2, 3 that said defendant(s) Eric Otto White personally used a firearm, a handgun, within the meaning of Penal Code section 12022.53(b).

COUNT 3

On or about August 26, 2020, in the above named judicial district, the crime of ATTEMPTED WILLFUL, DELIBERATE, AND PREMEDITATED ATTEMPTED MURDER, in violation of PENAL CODE SECTION 664/187(a), a felony, was committed by Eric Otto White, who did unlawfully and with malice aforethought attempt to murder **Kavona Kimberly Brooks-Lee**, a human being.

It is further alleged that the aforesaid attempted murder was committed willfully, deliberately and with premeditation within the meaning of Penal Code section 664(a).

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

It is further alleged as to count(s) 1, 2, 3 that said defendant(s) Eric Otto White personally and intentionally discharged a firearm, a handgun, which proximately caused great bodily injury and death to Kavona Kimberly Brooks-Lee within the meaning of Penal Code section 12022.53(d).

It is further alleged as to count(s) 1, 2, 3 that said defendant(s) Eric Otto White personally and intentionally discharged a firearm, a handgun, within the meaning of Penal Code section 12022.53(c).

It is further alleged as to count(s) 1, 2, 3 that said defendant(s) Eric Otto White personally used a firearm, a handgun, within the meaning of Penal Code section 12022.53(b).

It is further alleged pursuant to Penal Code sections 1170.12(a) through (d) and 667(b) through (i) as to count(s) 1, 2, 3 that said defendant(s) Eric Otto White, has suffered the following prior conviction of a serious or violent felony or juvenile adjudication:

Court Case	Code/Statute	Conv Date	County	State	Court Type
SCR38149	PC664/211	07/13/1981	San Bernardino	CA	Municipal

* * * * *

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 3 COUNT(S).

Executed at San Bernardino, California, on September 8, 2020.

Cecilia H. Joo

Cecilia H. Joo
DECLARANT AND COMPLAINANT

Agency: Redlands Police Department

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Eric Otto White	01/23/1963		A06296919	