

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
JOSHUA TREE DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)	
)	
Plaintiff)	
)	
vs.)	
)	
Nicole Rachel Packer ,)	FELONY COMPLAINT
aka Nicole Rachelle Packer)	
)	
Defendant)	DA CASE NO 2020-00-0045916

The undersigned is informed and believes that:

COUNT 1

On or about June 12, 2019, in the above named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Nicole Rachel Packer, who did unlawfully, and with malice aforethought murder Jane Doe, 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)."

COUNT 2

On or about June 12, 2019, in the above named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Nicole Rachel Packer, who did unlawfully, and with malice aforethought murder John Doe, 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)."

COUNT 3

On or about June 12, 2019, in the above named judicial district, the crime of DRIVING WHILE UNDER THE INFLUENCE OF ALCOHOL CAUSING INJURY - PRIOR CONVICTION, in violation of VEHICLE CODE SECTION 23153(a), a felony, was committed by Nicole Rachel Packer, who did unlawfully, while under the influence of an alcoholic beverage, drive a vehicle and

concurrently did an act forbidden by law, and neglected a duty imposed by law in driving the vehicle, which act and neglect proximately caused bodily injury to Colin Peter Campbell, Gail Deborah Lerner, John Doe and Jane Doe.

It is further alleged, pursuant to Vehicle Code section 23560, Vehicle Code section 23566, and Vehicle Code section 23550.5(a), that the defendant, within 10 years of the commission of the above offense, committed an offense which resulted in the following prior conviction:

Off Date	Conv Date	VC Section	Court	Docket #
12/05/2012	01/15/2013	VC 23152(b)	Superior	TMB1200519

It is further alleged that during the commission of the above violation of Vehicle Code Section 23153, the defendant Nicole Rachel Packer proximately caused bodily injury and/or death to more than one victim and is thus subject to the additional punishment provided for in Vehicle Code Section 23558.

It is further alleged that during the commission of the above violation of Vehicle Code Section 23153, the defendant Nicole Rachel Packer drove a vehicle 20 or more miles per hour over the maximum, prima facie, and/or posted speed limit on a street or highway, and in a manner prohibited by Vehicle Code Section 23103, and is thus subject to the additional punishment provided for in Vehicle Code Section 23582.

COUNT 4

On or about June 12, 2019, in the above named judicial district, the crime of DRIVING WITH A .08% BLOOD ALCOHOL CONTENT CAUSING INJURY- PRIOR CONVICTION, in violation of VEHICLE CODE SECTION 23153(b), a felony, was committed by Nicole Rachel Packer, who did unlawfully, while having 0.08 percent or more, by weight, of alcohol in the blood, drive a vehicle and concurrently did an act forbidden by law, and neglected a duty imposed by law in driving the vehicle, which act and neglect proximately caused bodily injury to Colin Peter Campbell, Gail Deborah Lerner, John Doe and Jane Doe.

It is further alleged, pursuant to Vehicle Code section 23560, Vehicle Code section 23566, and Vehicle Code section 23550.5(a), that the defendant, within 10 years of the commission of the above offense, committed an offense which resulted in the following prior conviction:

Off Date	Conv Date	VC Section	Court	Docket #
12/05/2012	01/15/2013	VC 23152(b)	Superior	TMB1200519

It is further alleged that during the commission of the above violation of Vehicle Code Section 23153, the defendant Nicole Rachel Packer proximately caused bodily injury and/or death to more than one victim and is thus subject to the additional punishment provided for in Vehicle Code Section 23558.

It is further alleged that during the commission of the above violation of Vehicle Code Section 23153, the defendant Nicole Rachel Packer drove a vehicle 20 or more miles per hour over the maximum, prima facie, and/or posted speed limit on a street or highway, and in a manner prohibited by Vehicle Code Section 23103, and is thus subject to the additional punishment provided for in Vehicle Code Section 23582.

COUNT 5

On or about June 12, 2019, in the above named judicial district, the crime of DRIVING WHILE UNDER THE COMBINED INFLUENCE OF ALCOHOL AND DRUG CAUSING INJURY-PRIOR CONVICTION, in violation of VEHICLE CODE SECTION 23153(g), a felony, was committed by Nicole Rachel Packer, who did unlawfully, while under the combined influence of any alcoholic beverage and drug, drive a vehicle and concurrently did an act forbidden by law, and neglected a duty imposed by law in driving the vehicle, which act and neglect proximately caused bodily injury to Colin Peter Campbell, Gail Deborah Lerner, John Doe and Jane Doe.

It is further alleged, pursuant to Vehicle Code section 23560, Vehicle Code section 23566, and Vehicle Code section 23550.5(a), that the defendant, within 10 years of the commission of the above offense, committed an offense which resulted in the following prior conviction:

Off Date	Conv Date	VC Section	Court	Docket #
12/05/2012	01/15/2013	VC 23152(b)	Superior	TMB1200519

It is further alleged that during the commission of the above violation of Vehicle Code Section 23153, the defendant Nicole Rachel Packer proximately caused bodily injury and/or death to more than one victim and is thus subject to the additional punishment provided for in Vehicle Code Section 23558.

It is further alleged that during the commission of the above violation of Vehicle Code Section 23153, the defendant Nicole Rachel Packer drove a vehicle 20 or more miles per hour over the maximum, prima facie, and/or posted speed limit on a street or highway, and in a manner prohibited by Vehicle Code Section 23103, and is thus subject to the additional punishment provided for in Vehicle Code Section 23582.

It is further alleged as to Counts 3, 4 and 5 that in the commission of the above offense the said defendant, Nicole Rachel Packer, personally inflicted great bodily injury upon Colin Peter Campbell, not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8) and a violent felony within the meaning of Penal Code Section 667.5(c)(8).

"NOTICE: This offense is a serious felony and a violent felony within the meaning of Penal Code sections 1192.7(c)(8) and 667.5(c)(8)."

It is further alleged as to Counts 3, 4 and 5 that in the commission of the above offense the said defendant, Nicole Rachel Packer, personally inflicted great bodily injury upon Gail Deborah Lerner, not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8) and a violent felony within the meaning of Penal Code Section 667.5(c)(8).

"NOTICE: This offense is a serious felony and a violent felony within the meaning of Penal Code sections 1192.7(c)(8) and 667.5(c)(8)."

COUNT 6

On or about June 12, 2019, in the above named judicial district, the crime of DRIVING WHEN PRIVILEGE SUSPENDED OR REVOKED, in violation of VEHICLE CODE SECTION 14601.1(a), a misdemeanor, was committed by Nicole Rachel Packer, who did unlawfully drive a motor vehicle upon a highway at a time when her driving privilege was suspended and revoked for a reason other than one listed in Section 14601 and 14601.2 of the Vehicle Code, to wit, FAILURE TO APPEAR, and when she had knowledge of such suspension and revocation.

* * * * *

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 6 COUNT(S).

Executed at Joshua Tree, California, on December 2, 2020.

Jason M. Gueltzow
DECLARANT AND COMPLAINANT

Agency: Morongo CHP

Prelim Est. 00:00

Defendant
Nicole Rachel Packer

Birth Date
12/20/1985

Booking No.

CII No.
A26694541

NCIC