

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)	
)	
Plaintiff)	
)	
vs.)	
)	
Dakarai Jeffrey)	FELONY COMPLAINT
)	
)	
Defendant)	DA CASE NO 2021-00-0015849

The undersigned is informed and believes that:

COUNT 1

On or about April 1, 2021, in the above named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Dakarai Jeffrey, who did unlawfully, and with malice aforethought murder Norris Edward Cole , 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 that said defendant(s) Dakarai Jeffrey personally and intentionally discharged a firearm, a handgun, which proximately caused great bodily injury and death to Norris Edward Cole within the meaning of Penal Code section 12022.53(d).

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

COUNT 2

On or about April 1, 2021, in the above named judicial district, the crime of POSSESSION OF FIREARM BY A FELON, in violation of PENAL CODE SECTION 29800(a)(1), a felony, was committed by Dakarai Jeffrey, who did unlawfully own, purchase, receive, possess, and have custody and control of a firearm, to wit, Handgun, the said defendant(s) having been convicted of a felony under the laws of the United States, the state of California and any other state, government and county:

Court Case	Code/Statute	Conv Date	County	State	Court Type
KA023007	PC 459-1ST	08/29/1994	Los Angeles	CA	Superior
FSB900461	PC12021	07/20/2009	San Bernardino	CA	Superior

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 that said defendant(s) Dakarai Jeffrey, 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
KA023007	PC 459-1ST	08/29/1994	Los Angeles	CA	Superior

* * * * *

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 2 COUNT(S).

Executed at San Bernardino, California, on April 7, 2021.

J. Uhlman

J. Uhlman

DECLARANT AND COMPLAINANT

Agency: San Bernardino Police Department

Prelim Est. 00:00

Defendant
Dakarai Jeffrey

Birth Date
12/28/1974

Booking No.

CII No.
A09813546

NCIC