

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO  
RANCHO CUCAMONGA DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,	)	
	)	
Plaintiff	)	
	)	
vs.	)	FELONY COMPLAINT
	)	
David Shenhan Yang	)	
Natasha Harris	)	
	)	DA CASE NO 2022-00-0017105
	)	
Defendant	)	
	)	
	)	
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	)	
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The undersigned is informed and believes that:

COUNT 1

On or about September 01, 2021 through February 16, 2022, in the above-named judicial district, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by David Shenhan Yang, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, Jane Doe #1 (DOB:9/25/06), Jane Doe #2 (DOB: 1/27/06) and Jane Doe #3 (DOB: 5/06/05), to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said

child to be placed in such situation that his/her person and health was/were endangered.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) David Shenhan Yang is eligible for imprisonment in the state prison due to: the current charge is a serious or violent felony; defendant(s) David Shenhan Yang has a prior serious or violent felony conviction;

defendant(s) David Shenhan Yang has been convicted of a crime with a Penal Code section 186.11 enhancement; the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 2

On or about September 01, 2021 through February 16, 2022, in the above-named judicial district, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Natasha Harris, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, Jane Doe #1 (DOB:9/25/06), Jane Doe #2 (DOB: 1/27/06) and Jane Doe #3 (DOB: 5/06/05), to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Natasha Harris is eligible for imprisonment in the state prison due to: the current charge is a serious or violent felony; defendant(s) Natasha Harris has a prior serious or violent felony conviction; defendant(s) Natasha Harris has been convicted of a crime with a Penal Code section 186.11 enhancement; the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 3

On or about September 01, 2021, in the above-named judicial district, the crime of FAILURE OF A MANDATED REPORTER TO REPORT CHILD ABUSE OR NEGLECT, in violation of PENAL CODE SECTION 11166, a misdemeanor, was committed by David Shenhan Yang, who was a mandated report, as defined in Penal Code section 11165.7, and did willfully and unlawfully fail to report an incident of known or reasonably suspected child abuse or neglect as required by Penal Code section 11166.

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#### COUNT 4

On or about November 05, 2022, in the above-named judicial district, the crime of FAILURE OF A MANDATED REPORTER TO REPORT CHILD ABUSE OR NEGLECT, in violation of PENAL

CODE SECTION 11166, a misdemeanor, was committed by David Shenhan Yang, who was a mandated report, as defined in Penal Code section 11165.7, and did willfully and unlawfully fail to report an incident of known or reasonably suspected child abuse or neglect as required by Penal Code section 11166.

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COUNT 5

On or about September 01, 2021, in the above-named judicial district, the crime of FAILURE OF A MANDATED REPORTER TO REPORT CHILD ABUSE OR NEGLECT, in violation of PENAL CODE SECTION 11166, a misdemeanor, was committed by Natasha Harris, who was a mandated report, as defined in Penal Code section 11165.7, and did willfully and unlawfully fail to report an incident of known or reasonably suspected child abuse or neglect as required by Penal Code section 11166.

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COUNT 6

On or about November 05, 2022, in the above-named judicial district, the crime of FAILURE OF A MANDATED REPORTER TO REPORT CHILD ABUSE OR NEGLECT, in violation of PENAL CODE SECTION 11166, a misdemeanor, was committed by Natasha Harris, who was a mandated report, as defined in Penal Code section 11165.7, and did willfully and unlawfully fail to report an incident of known or reasonably suspected child abuse or neglect as required by Penal Code section 11166.

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It is further alleged as to each count, pursuant to Penal Code section 1170, subdivision (b)(2), that the following circumstances may apply in this case:

1. The crime involved great violence, great bodily harm, threat of great bodily harm, or other acts disclosing a high degree of cruelty, viciousness, or callousness;
2. The victim was particularly vulnerable;
3. The defendant induced others to participate in the commission of the crime or occupied a position of leadership or dominance of other participants in its commission;
4. The defendant induced a minor to commit or assist in the commission of the crime;
5. The defendant threatened witnesses, unlawfully prevented or dissuaded witnesses from testifying, suborned perjury, or in any other way illegally interfered with the judicial process;

6. The manner in which the crime was carried out indicates planning, sophistication, or professionalism;
7. The defendant took advantage of a position of trust or confidence to commit the offense.
8. And any other aggravating factors that may be permitted by law.

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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 6 COUNT(S).

Executed at Rancho Cucamonga, California, on February 23, 2022

A. Watson

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A. Watson

DECLARANT AND COMPLAINANT

Agency: Rialto Police Department

Prelim Est.

Defendant	Birth Date	Booking No	CII No.	NCIC
David Shenhan Yang	1983-01-30		A26480533	
Natasha Harris	1984-07-30		A28467459	