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

THE PEOPLE OF THE STATE OF CALIFORNIA,	
Plaintiff	SECOND
vs. Gerardo Llamas Torres (FSB25000243) aka Gerardo Llamas aka Gerardo Torres Llamas Arnaldo Enrique Ruelas (FSB25000244) aka Arnald Ruelas Reynaldo Warner Ruelas (FSB25000245) aka Reynaldo Ruelas Juan Perez (FSB25000519) Sergio Herrera Reveles aka Sergio Herrera Reveles	AMENDED Felony COMPLAINT DA CASE NO 2025-00-0003466
Defendant	

The undersigned is informed and believes that:

COUNT 1

On or about January 10, 2025, in the above-named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Gerardo Llamas Torres, Arnaldo Enrique Ruelas, Reynaldo Warner Ruelas, Juan Perez and Sergio Herrera Reveles, who did unlawfully, and with malice aforethought murder Yesenia "Jessica" Torres, 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 1 that the murder of Yesenia Torres was committed by defendant Gerardo Llamas Torres and that the defendant intentionally killed the victim by means of lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

It is further alleged as to count 1 that the murder of Yesenia Torres was intentional and was carried out by the defendant Gerardo Llamas Torres for financial gain, within the meaning of Penal Code Section 190.2(a)(1).

It is further alleged as to count 1 that the murder of Yesenia Torres was committed by defendant Gerardo Llamas Torres while the said defendant was engaged in the commission of the crime of robbery in violation of Penal Code Section 211 and 212.5, within the meaning of Penal Code Section 190.2(a)(17).

It is further alleged as to count that the murder of Yesenia Torres was aided and abetted, counseled, commanded, induced, solicited, requested, and/or assisted by defendant Arnaldo Enrique Ruelas and that the defendants intentionally killed the victim by means of lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

It is further alleged as to count 1 that the murder of Yesenia Torres was intentional and was aided and abetted and assisted by the defendant Arnaldo Enrique Ruelas for financial gain, within the meaning of Penal Code Section 190.2(a)(1).

It is further alleged as to count 1 that the murder of Yesenia Torres was aided and abetted, counseled, commanded, induced, solicited, and/or assisted by defendant Arnaldo Enrique Ruelas while the said defendant was accomplice in the commission of the crime of robbery in violation of Penal Code Section 211 and 212.5, within the meaning of Penal Code Section 190.2(a)(17).

It is further alleged as to count 1 that the murder of Yesenia Torres was aided and abetted, counseled, commanded, induced, solicited, requested, and/or assisted by defendant Reynaldo Warner Ruelas and that the defendants intentionally killed the victim by means of lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

It is further alleged as to count 1 that the murder of Yesenia Torres was intentional and was aided and abetted and assisted by the defendant Reynaldo Warner Ruelas for financial gain, within the meaning of Penal Code Section 190.2(a)(1).

It is further alleged as to count 1 that the murder of Yesenia Torres was and was aided and abetted, counseled, commanded, induced, solicited, and/or assisted by defendant Reynaldo Warner Ruelas while the said defendant was an accomplice in the commission of the crime of robbery in violation of Penal Code Section 211 and 212.5, within the meaning of Penal Code Section 190.2(a)(17).

It is further alleged as to count 1 that the murder of Yesenia Torres aided and abetted, counseled, commanded, induced, solicited, requested, and/or assisted by defendant Juan Perez and that the defendants intentionally killed the victim by means of lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

It is further alleged as to count 1 that the murder of Yesenia Torres was intentional and was aided and abetted and assisted by the defendant Juan Perez for financial gain, within the meaning of Penal Code Section 190.2(a)(1).

It is further alleged as to count 1 that the murder of Yesenia Torres was aided and abetted, counseled, commanded, induced, solicited, and/or assisted by defendant Juan Perez while the said defendant was an accomplice in the commission of the crime of robbery in violation of Penal Code Section 211 and 212.5, within the meaning of Penal Code Section 190.2(a)(17).

It is further alleged as to count 1 that the murder of Yesenia Torres was intentional and was aided and abetted, counseled, commanded, induced, solicited, requested, and/or assisted by the defendant Sergio Herrera Reveles for financial gain, within the meaning of Penal Code Section 190.2(a)(1).

It is further alleged as to count 1 that the murder of Yesenia Torres was aided and abetted, counseled, commanded, induced, solicited, and/or assisted by defendant Sergio Herrera Reveles while the said defendant was an accomplice in the commission of the crime of robbery in violation of Penal Code Section 211 and 212.5, within the meaning of Penal Code Section 190.2(a)(17).

It is further alleged as to count(s) 1 that the murder of Yesenia Torres was aided and abetted by defendant(s) Sergio Herrera Reveles and that the defendant(s) intentionally killed the victim by means of lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

* * * * *

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 defendant was armed with or used a weapon at the time of the commission of the crime;
- 3. The victim was particularly vulnerable;
- 4. 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;
- 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 crime involved an attempted or actual taking or damage of great monetary value;
- 8. The crime involved a large quantity of contraband;
- 9. The defendant took advantage of a position of trust or confidence to commit the offense.
- 10. The defendant has engaged in violent conduct that indicates a serious danger to society; and
- 11. 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 1 COUNT(S).

Executed at San Bernardino, California, on February 13, 2025.

Justin J. Crocker Justin Crocker DECLARANT AND COMPLAINANT

Agency: San Bernardino Police Department		<u>Prelim Est.</u>		
Defendant	Birth Date	Booking No	CII No.	NCIC
Gerardo Llamas Torres	1993-08-19	2501300610	A40358252	
Arnaldo Enrique Ruelas	1970-05-22	2501341213	A09046501	
Reynaldo Warner Ruelas	1987-12-01	2501341211	A26160688	
Juan Perez	1982-03-09		A23312650	
Sergio Herrera Reveles	1971-06-26		A11898916	