



have seen the lamp, the peace officer's motor vehicle was sounding its siren as was reasonably necessary, the peace officer's motor vehicle was distinctively marked, the peace officer's motor vehicle was operated by a peace officer. It is further alleged that the defendant(s) drove with a willful or wanton disregard for the safety of persons and property.

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### COUNT 3

On or about March 17, 2025, in the above-named judicial district, the crime of DRIVING OR TAKING A VEHICLE WITHOUT CONSENT, in violation of VEHICLE CODE SECTION 10851(a), a felony, was committed by Ryan Dwayne Turner Jr, who did drive a vehicle, to wit: 2016 Hyundai Sonata, without the consent of the owner, Michael Camacho, and with the intent to deprive the owner of title and possession of the vehicle.

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\*\*\*\*\*

It is further alleged pursuant to Penal Code Section 666.5 as to count(s) 3 that the Ryan Dwayne Turner Jr was previously convicted of the crime(s) listed below:

Court Case	Code/Statute	Conv Date	County	State	Court Type
FSB23003737	VC10851(a)	2024-02-22	San Bernardino	CA	Superior
FWV24000408	VC10851(a)	2024-02-22	San Bernardino	CA	Superior

\* \* \* \* \*

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 convicted of other crimes for which consecutive sentences could have been imposed but for which concurrent sentences are being imposed;
3. The crime involved an attempted or actual taking or damage of great monetary value;
4. The defendant has engaged in violent conduct that indicates a serious danger to society;
5. The defendant's prior convictions as an adult or sustained petitions in juvenile delinquency proceedings are numerous or of increasing seriousness;
6. The defendant has served a prior term in prison or county jail under section 1170(h);  
and

7. The defendant's prior performance on probation, mandatory supervision, postrelease community supervision, or parole was unsatisfactory; and
8. And any other aggravating factors that may be permitted by law.

\* \* \* \* \*

**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 Victorville, California, on March 19, 2025

Jamie Cimino

Jamie Cimino

DECLARANT AND COMPLAINANT

Agency: SBSO Victorville City Police Dept

Prelim Est.

Defendant	Birth Date	Booking No	CII No.	NCIC
Ryan Dwayne Turner Jr	2002-12-27	2503370573	A41178544	