

11/03/2025

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO Estrada, Ana  
RANCHO CUCAMONGA DISTRICT Deputy Clerk of the Superior Court

|                                        |   |                                |
|----------------------------------------|---|--------------------------------|
| THE PEOPLE OF THE STATE OF CALIFORNIA, | ) | COURT CASE NUMBER: FWV25004311 |
|                                        | ) |                                |
| Plaintiff                              | ) |                                |
|                                        | ) |                                |
| vs.                                    | ) | FELONY COMPLAINT               |
|                                        | ) |                                |
| Angelo Jose Saldivar                   | ) |                                |
| aka Angelo Saldivar                    | ) |                                |
|                                        | ) | DA CASE NO 2025-00-0064581     |
|                                        | ) |                                |
| Defendant                              | ) |                                |
|                                        | ) |                                |
|                                        | ) |                                |
|                                        | ) |                                |

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The undersigned is informed and believes that:

COUNT 1

On or about October 27, 2025, in the above-named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Angelo Jose Saldivar, who did unlawfully and with malice aforethought, murder Andrew Nunez, a human being.

It is further alleged as to count 1 that said defendant Angelo Jose Saldivar personally and intentionally discharged a firearm, a handgun, which proximately caused great bodily injury and death to Andrew Nunez within the meaning of Penal Code section 12022.53(d).

It is further alleged as to count 1 that the murder of Andrew Nunez was committed by the defendant Angelo Jose Saldivar for the purpose of avoiding and preventing a lawful arrest and perfecting and attempting to perfect an escape from lawful custody, within the meaning of Penal Code Section 190.2(a)(5).

It is further alleged, as to count 1 that the murder of Andrew Nunez was committed by defendant Angelo Jose Saldivar and that Andrew Nunez was a peace officer who was intentionally killed while engaged in the performance of his duties, and that said defendant knew and reasonably should have known that Andrew Nunez was a peace officer engaged in the performance of his/her duties, within the meaning of Penal Code Section 190.2(a)(7).

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## COUNT 2

On or about October 27, 2025, in the above-named judicial district, the crime of ATTEMPTED KIDNAPPING, in violation of PENAL CODE SECTION 664/207(a), a felony, was committed by Angelo Jose Saldivar, who did unlawfully, attempt to forcibly and by instilling fear, steal, take, hold, detain and arrest Veronica Garcia Saldivar in San Bernardino County, California, and did take the said Veronica Garcia Saldivar into another country, state, county and another part of San Bernardino County.

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 2 that said defendant Angelo Jose Saldivar personally used a firearm, a handgun, within the meaning of Penal Code section 12022.53(b).

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## COUNT 3

On or about October 27, 2025, in the above-named judicial district, the crime of ASSAULT WITH A SEMIAUTOMATIC FIREARM-PERSONAL USE OF FIREARM, in violation of PENAL CODE SECTION 245(b), a felony, was committed by Angelo Jose Saldivar, who did willfully and unlawfully commit an assault upon Maria Mercado with a semiautomatic firearm.

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 that the defendant Angelo Jose Saldivar personally used a firearm, to wit, a handgun within the meaning of Penal Code Section 12022.5(a) and (d), 1192.7(c) and 667.5(c)

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#### COUNT 4

On or about October 27, 2025, in the above-named judicial district, the crime of ASSAULT WITH A SEMIAUTOMATIC FIREARM-PERSONAL USE OF FIREARM, in violation of PENAL CODE SECTION 245(b), a felony, was committed by Angelo Jose Saldivar, who did willfully and unlawfully commit an assault upon Alejandro Grajada with a semiautomatic firearm.

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 that the defendant Angelo Jose Saldivar personally used a firearm, to wit, a handgun within the meaning of Penal Code Section 12022.5(a) and (d), 1192.7(c) and 667.5(c)

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#### COUNT 5

On or about October 27, 2025, in the above-named judicial district, the crime of ASSAULT WITH A SEMIAUTOMATIC FIREARM-PERSONAL USE OF FIREARM, in violation of PENAL CODE SECTION 245(b), a felony, was committed by Angelo Jose Saldivar, who did willfully and unlawfully commit an assault upon Victor Espinoza with a semiautomatic firearm.

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 that the defendant Angelo Jose Saldivar personally used a firearm, to wit, a handgun within the meaning of Penal Code Section 12022.5(a) and (d), 1192.7(c) and 667.5(c)

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### COUNT 6

On or about October 27, 2025, in the above-named judicial district, the crime of ASSAULT WITH A SEMIAUTOMATIC FIREARM-PERSONAL USE OF FIREARM, in violation of PENAL CODE SECTION 245(b), a felony, was committed by Angelo Jose Saldivar, who did willfully and unlawfully commit an assault upon Francisco Javier Gomez-Lopez with a semiautomatic firearm.

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 that the defendant Angelo Jose Saldivar personally used a firearm, to wit, a handgun within the meaning of Penal Code Section 12022.5(a) and (d), 1192.7(c) and 667.5(c)

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### COUNT 7

On or about October 27, 2025, in the above-named judicial district, the crime of DISCHARGE OF FIREARM WITH GROSS NEGLIGENCE, in violation of PENAL CODE SECTION 246.3(a), a felony, was committed by Angelo Jose Saldivar, who did willfully and unlawfully discharge a firearm in a grossly negligent manner which could result in injury and death to a person.

NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c).

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### COUNT 8

On or about October 27, 2025, in the above-named judicial district, the crime of EVADING AN OFFICER, WILLFUL DISREGARD, in violation of VEHICLE CODE SECTION 2800.2(a), a felony, was committed by Angelo Jose Saldivar, who did willfully and unlawfully, while operating a motor vehicle and with the intent to evade, flee and otherwise attempt to elude a pursuing peace

officer's motor vehicle while all of the following conditions existed: the peace officer's motor vehicle exhibited at least one lighted red lamp visible from the front and the defendant saw and reasonably should 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 drove with a willful or wanton disregard for the safety of persons and property.

It is further alleged as to count 8 that in the commission and attempted commission of the above offense a principal in said offense was armed with a firearm, to wit, handgun, said arming not being an element of the above offense, within the meaning of Penal Code section 12022(a)(1).

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#### COUNT 9

On or about October 27, 2025, in the above-named judicial district, the crime of FALSE IMPRISONMENT BY VIOLENCE, in violation of PENAL CODE SECTION 236, a felony, was committed by Angelo Jose Saldivar, who did unlawfully violate the personal liberty of Veronica Garcia Saldivar, said violation being effected by violence, menace, fraud, and deceit.

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#### COUNT 10

On or about October 27, 2025, in the above-named judicial district, the crime of BATTERY ON A SPOUSE, COHABITANT, FIANCÉ, BOYFRIEND, GIRLFRIEND OR CHILD'S PARENT, in violation of PENAL CODE SECTION 243(e)(1), a misdemeanor, was committed by Angelo Jose Saldivar, who did willfully and unlawfully use force and violence upon the person of Veronica Garcia Saldivar, a person who is a former spouse, former fiancé or fiancé of the defendant.

NOTICE: Pursuant to Evidence Code Section 1108 and 1109, the People will move to admit evidence consistent with the defendant's criminal history and law enforcement reports.

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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 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 was convicted of other crimes for which consecutive sentences could have been imposed but for which concurrent sentences are being imposed;
5. The manner in which the crime was carried out indicates planning, sophistication, or professionalism;
6. The defendant has engaged in violent conduct that indicates a serious danger to society;
7. 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 10 COUNT(S).

Executed at Rancho Cucamonga, California, on November 03, 2025

Deborah Ploghaus

Deborah Ploghaus

DECLARANT AND COMPLAINANT

Agency: SBSO Rancho Cucamonga Station [RC/11]

Prelim Est.

Defendant

Angelo Jose Saldivar

Birth Date

1978-06-22

Booking No

2511340147

CII No.

A10129339

NCIC