

12/15/2025

Solis, Christian

Deputy Clerk of the Superior Court

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)

Plaintiff)

vs.)

Shelley Martin
Darryl Muzic Martin
Rudy Franco Moreno
Andre Thomas

Defendant)

FELONY COMPLAINT

COURT CASE NUMBER: FSB25004618

DA CASE NO 2025-00-0071716

The undersigned is informed and believes that:

COUNT 1

On or about May 25, 2023, in the above-named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Shelley Martin and Rudy Franco Moreno, who did unlawfully, and with malice aforethought murder Emilio Ghanem, 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).

COUNT 2

On or about May 25, 2023, in the above-named judicial district, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a felony, was committed

by Shelley Martin and Rudy Franco Moreno, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Murder, in violation of Section 187 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s)s committed the following overt act and acts at and in the County of San Bernardino: Lure into meeting with victim and conduct surveillance on victim.

COUNT 3

On or about January 16, 2010, in the above-named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Shelley Martin, Darryl Muzic Martin and Andre Thomas, who did unlawfully, and with malice aforethought murder Timothy T., 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 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 induced a minor to commit or assist in the commission of the crime;
6. The defendant threatened witnesses, unlawfully prevented or dissuaded witnesses from testifying, suborned perjury, or in any other way illegally interfered with the judicial process;
7. The defendant was convicted of other crimes for which consecutive sentences could have been imposed but for which concurrent sentences are being imposed;
8. The manner in which the crime was carried out indicates planning, sophistication, or professionalism;

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;
11. 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 San Bernardino, California, on December 15, 2025

Justin J. Crocker

Justin J. Crocker

DECLARANT AND COMPLAINANT

Agency: Colton Police Department

Prelim Est.

Defendant	Birth Date	Booking No	CII No.	NCIC
Shelley Martin	1963-02-18			
Darryl Muzic Martin	1967-11-13		A43259250	
Rudy Franco Moreno	1982-03-26		A21278843	
Andre Thomas	1977-01-28		A11571139	