

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

The undersigned is informed and believes that:

COUNT 1

On or about November 18, 2025, in the above-named judicial district, the crime of FIRST DEGREE MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Gordon Abas Goodarzi, who did unlawfully, murder Aryan Papoli, 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).

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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 manner in which the crime was carried out indicates planning, sophistication, or professionalism;
4. The crime involved an attempted or actual taking or damage of great monetary value;

5. The defendant took advantage of a position of trust or confidence to commit the offense.
6. 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 January 23, 2026

Britt Imes
Britt Imes
DECLARANT AND COMPLAINANT

Agency: SBSO Specialized Investigations (Homicide/CAC) [SI/60] Prelim Est.

Defendant	Birth Date	Booking No	CII No.	NCIC
Gordon Abas Goodarzi	1959-03-20		A24645507	