

THE SUPERIOR COURT, STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA DIVISION

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

12/31/2024

Darrel E. Parker, Executive Officer
BY Diaz, Alicia Deputy Clerk

THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff,

vs.

JESUS LOPEZ RAMIREZ

DOB: 03/27/2006

AKA: JESUS RENEE LOPEZ

AKA: JESUS LOPEZ RAMIREZ

ALEX BRANDON LOPEZ RAMIREZ

DOB: 08/09/2003

AKA: ALEX BRANDON LOPEZ- RAMIREZ

AKA: ALEX BRANDON

Defendant(s).

DA No. 24-003198

Court No. 24CR09943

FELONY COMPLAINT

The undersigned is informed and believes that:

COUNT 1

On or about the 10th day of December, 2024 in the County of Santa Barbara, the crime of MURDER, in violation of Penal Code Section 187(a), a Felony, was committed by **JESUS LOPEZ RAMIREZ**, who did unlawfully, and with malice aforethought murder **JOHN DOE (A.H.)** a human being.

It is further alleged that the above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)(1).

It is further alleged that the above offense is a violent felony within the meaning of Penal Code Section 667.5(c)(1).

ALLEGATION – WILLFUL, DELIBERATE, PREMEDITATED

It is further alleged that the above offense, as to defendant **JESUS LOPEZ RAMIREZ**, pursuant to Penal Code Section 189(a), was perpetrated by means of willful, deliberate, and premeditated killing.

SPECIAL CIRCUMSTANCE MURDER – CRIMINAL STREET GANG

It is further alleged that the above offense, defendant **JESUS LOPEZ RAMIREZ**, pursuant to Penal Code Section 190.2(a)(22), intentionally killed **JOHN DOE (A.H.)**, while the defendant was an active participant in **WESTPARK**, a criminal street gang, and that the murder was carried out to further the activities of the criminal street gang.

ALLEGATION – GANG RELATED FIREARM ENHANCEMENT

It is further alleged as to Count 1 the defendant, **JESUS LOPEZ RAMIREZ**, in the commission of the foregoing offenses, a principal personally and intentionally discharged a firearm, to wit: FIREARM, and proximately caused death to a person other than the accomplice, to wit: **JOHN DOE (A.H.)**, within the meaning of §12022.53 (d) & (e) of the Penal Code.

ALLEGATION – STREET TERRORISM

It is further alleged that the above offense, pursuant to Penal Code Section 186.22(b)(1)(C) was committed by defendant **JESUS LOPEZ RAMIREZ** for the common benefit of, or at the direction of, or in association with a criminal street gang, to wit: **WESTPARK** with the specific intent to promote, or further, or assist in criminal conduct by gang members.

"NOTICE: The above offense is a violent felony within the meaning of Penal Code Section 667.5(C)(7)(8)(12) and a serious felony within the meaning of Penal Code section 1192.7(c) (28)."

ALLEGATION – OFFENSE WHILE ON BAIL OR O.R.

It is further alleged at the time of the commission of the above offense, defendant **JESUS LOPEZ RAMIREZ**, was released from custody on bail or Own Recognizance in Case Number 24CR04960 within the meaning of Penal Code section 12022.1(b).

COUNT 2

On or about the 10th day of December, 2024, in the County of Santa Barbara, the crime of POSSESSION OF AN ASSAULT WEAPON, in violation of Penal Code Section 30605(a), a Felony, was committed by **JESUS LOPEZ RAMIREZ & ALEX BRANDON LOPEZRAMIREZ**, who did willfully and unlawfully possess, own and have in his/her possession and under his/her control a certain assault weapon, to wit: **ASSAULT RIFLE**.

ALLEGATION – STREET TERRORISM

It is further alleged that the above offense, pursuant to Penal Code Section 186.22(b)(1)(A), was committed by defendants **JESUS LOPEZ RAMIREZ & ALEX BRANDON LOPEZRAMIREZ** for the common benefit of, or at the direction of, or in association with a criminal street gang, to wit: Westpark, with the specific intent to promote, or further, or assist in criminal conduct by gang members.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) (28)."

ALLEGATION – OFFENSE WHILE ON BAIL OR O.R.

It is further alleged at the time of the commission of the above offense, defendant **JESUS LOPEZ RAMIREZ**, was released from custody on bail or Own Recognizance in Case Number 24CR04960 within the meaning of Penal Code section 12022.1(b).

ALLEGATION – OFFENSE WHILE ON BAIL OR O.R.

It is further alleged at the time of the commission of the above offense, defendant **ALEX BRANDON LOPEZRAMIREZ** was released from custody on bail or Own Recognizance in Case Number 24CR08282 within the meaning of Penal Code section 12022.1(b).

COUNT 3

On or about the 10th day of December, 2024, in the County of Santa Barbara, the crime of STREET TERRORISM, in violation of Penal Code Section 186.22(a), a Felony, was committed by **JESUS LOPEZ RAMIREZ & ALEX BRANDON LOPEZRAMIREZ**, who did unlawfully and actively participate in a criminal street gang, to wit: Westpark, with knowledge that its members engage in and have engaged in a pattern of criminal gang activity and did promote, further or assist in felony criminal conduct by gang members.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) (28)."

ALLEGATION – OFFENSE WHILE ON BAIL OR O.R.

It is further alleged at the time of the commission of the above offense, defendant **JESUS LOPEZ RAMIREZ**, was released from custody on bail or Own Recognizance in Case Number 24CR04960 within the meaning of Penal Code section 12022.1(b).

ALLEGATION – OFFENSE WHILE ON BAIL OR O.R.

It is further alleged at the time of the commission of the above offense, defendant **ALEX BRANDON LOPEZRAMIREZ** was released from custody on bail or Own Recognizance in Case Number 24CR08282 within the meaning of Penal Code section 12022.1(b).

COUNT 4

On or about the 10th day of December, 2024, in the County of Santa Barbara, the crime of POSSESSION OF FIREARM BY A FELON, in violation of Penal Code Section 29800(a)(1), a Felony, was committed by **JESUS LOPEZ RAMIREZ**, who did unlawfully own, possess and have custody and control of a firearm, to wit: **A FIREARM**.

It is further alleged that the defendant is prohibited from owning or possessing a firearm pursuant to sections 29800 and 29900 of the Penal Code and sections 8100 and 8103 of the Welfare and Institutions Code, having been previously convicted of the following offense(s):

<u>CONV/DT</u>	<u>SEC/VIOL</u>	<u>DKT/NO</u>	<u>TYPE/COURT</u>	<u>JURISDICTION</u>
11/06/2024	PC 25850(a)	24CR04960	SUPERIOR-LOMPOC	SANTA BARBARA

ALLEGATION – STREET TERRORISM

It is further alleged that the above offense, pursuant to Penal Code Section 186.22(b)(1)(A), was committed by defendant **JESUS LOPEZ RAMIREZ** for the common benefit of, or at the direction of, or in association with a criminal street gang, to wit: Westpark, with the specific intent to promote, or further, or assist in criminal conduct by gang members.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) (28)."

ALLEGATION – OFFENSE WHILE ON BAIL OR O.R.

It is further alleged at the time of the commission of the above offense, defendant **JESUS LOPEZ RAMIREZ**, was released from custody on bail or Own Recognizance in Case Number 24CR04960 within the meaning of Penal Code section 12022.1(b).

COUNT 5

On or about the 10th day of December, 2024, in the County of Santa Barbara, the crime of CARRYING A LOADED FIREARM WITHOUT PROPER REGISTRATION, in violation of Penal Code Section 25850(c)(6), a Felony, was committed by **JESUS LOPEZ RAMIREZ**, who unlawfully carried a loaded firearm on his person and/or in a vehicle in violation of this section and was not the person listed with the Department of Justice pursuant to Section 11106 as the registered owner.

ALLEGATION – STREET TERRORISM

It is further alleged that the above offense, pursuant to Penal Code Section 186.22(b)(1)(A), was committed by defendant **JESUS LOPEZ RAMIREZ** for the common benefit of, or at the direction of, or in association with a criminal street gang, to wit: Westpark, with the specific intent to promote, or further, or assist in criminal conduct by gang members.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) (28)."

ALLEGATION – OFFENSE WHILE ON BAIL OR O.R.

It is further alleged at the time of the commission of the above offense, defendant **JESUS LOPEZ RAMIREZ**, was released from custody on bail or Own Recognizance in Case Number 24CR04960 within the meaning of Penal Code section 12022.1(b).

COUNT 6

On or about the 10th day of December, 2024, in the County of Santa Barbara, the crime of **ACCESSORY AFTER THE FACT/KNOWLEDGE OF CRIME**, in violation of Penal Code Section 32, a Felony, was committed by **ALEX BRANDON LOPEZRAMIREZ**, who did unlawfully, having knowledge that the crime of **Murder**, a felony, in violation of Section 187 of the Penal Code of the State of California had been committed by **Lopez Ramirez, Jesus, and J.C.**, did harbor, conceal, and aid said person, with the intent that he might avoid and escape from arrest, trial, conviction, and punishment for said felony.

ALLEGATION – STREET TERRORISM

It is further alleged that the above offense, pursuant to Penal Code Section 186.22(b)(1)(A), was committed by defendant **ALEX BRANDON LOPEZRAMIREZ** for the common benefit of, or at the direction of, or in association with a criminal street gang, to wit: Westpark, with the specific intent to promote, or further, or assist in criminal conduct by gang members.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) (28)."

ALLEGATION – OFFENSE WHILE ON BAIL OR O.R.

It is further alleged at the time of the commission of the above offense, defendant **ALEX BRANDON LOPEZRAMIREZ** was released from custody on bail or Own Recognizance in Case Number 24CR08282 within the meaning of Penal Code section 12022.1(b).

COUNT 7

On or about the 10th day of December, 2024, in the County of Santa Barbara, the crime of **POSSESSION OF FIREARM BY PROHIBITED PERSON**, in violation of Penal Code Section 29820(b), a Felony, was committed by **ALEX BRANDON LOPEZRAMIREZ**, did unlawfully own, possess, and have custody and control of a firearm, to wit: A FIREARM.

It is further alleged that the above named defendant was under the age of thirty at the time he committed the offense and has been adjudged a ward of the juvenile court in case number 19JV00467, of the County of Santa Barbara, California on 11/18/2019 for a felony violation of Penal Code section 245(a)(4), within the meaning of Section 602 of the Welfare and Institutions Code, of an offense which is listed in Section 707(b) of Welfare and Institutions Code, or an offense described in Section 1203.073(b), 29805, 25850, 25400(a), or 26100(a) of the Penal Code.

ALLEGATION – STREET TERRORISM

It is further alleged that the above offense, pursuant to Penal Code Section 186.22(b)(1)(A), was committed by defendant **ALEX BRANDON LOPEZRAMIREZ** for the common benefit of, or at the direction of, or in association with a criminal street gang, to wit: Westpark, with the specific intent to promote, or further, or assist in criminal conduct by gang members.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) (28)."

ALLEGATION – OFFENSE WHILE ON BAIL OR O.R.

It is further alleged at the time of the commission of the above offense, defendant **ALEX BRANDON LOPEZRAMIREZ** was released from custody on bail or Own Recognizance in Case Number 24CR08282 within the meaning of Penal Code section 12022.1(b).

ALLEGATION: AGGRAVATING FACTORS

It is further alleged as to defendant **JESUS LOPEZ RAMIREZ**, counts 1-5, that the People will seek findings from the jury on factors in aggravation pursuant to California Rules of Court, Rule 4.421 that: Pursuant to California Rules of Court, Rule 4.421(a):

- (a)(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;
 - (a)(2) The defendant was armed with or used a weapon at the time of the commission of the crime;
 - (a)(3) The victim was particularly vulnerable;
 - (a)(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;
 - (a)(5) The defendant induced a minor to commit or assist in the commission of the crime;
 - (a)(7) The defendant was convicted of other crimes for which consecutive sentences could have been imposed but for which concurrent sentences are being imposed;
 - (a)(8) The manner in which the crime was carried out indicates planning, sophistication, or professionalism;
- Pursuant to California Rules of Court, Rule 4.421(b):
- (b)(1) The defendant has engaged in violent conduct that indicates a serious danger to society;

ALLEGATION: AGGRAVATING FACTORS

It is further alleged defendant as to **ALEX BRANDON LOPEZRAMIREZ**, counts 2, 3, 6 AND 7, that the People will seek findings from the jury on factors in aggravation pursuant to California Rules of Court, Rule 4.421 that: Pursuant to California Rules of Court, Rule 4.421(a):

- (a)(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;
 - (a)(2) The defendant was armed with or used a weapon at the time of the commission of the crime;
 - (a)(3) The victim was particularly vulnerable;
 - (a)(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;
 - (a)(5) The defendant induced a minor to commit or assist in the commission of the crime;
 - (a)(7) The defendant was convicted of other crimes for which consecutive sentences could have been imposed but for which concurrent sentences are being imposed;
 - (a)(8) The manner in which the crime was carried out indicates planning, sophistication, or professionalism;
- Pursuant to California Rules of Court, Rule 4.421(b):
- (b)(1) The defendant has engaged in violent conduct that indicates a serious danger to society;

Pursuant to Penal Code Section 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.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 5 COUNT(S).

Executed at Santa Maria, California, on 12/30/2024.



JOHN T. SAVRNOCH
DISTRICT ATTORNEY

Agency: SMPD
Agency Case No.: SMPD24-0016556

<u>DEFENDANT NAME</u>	<u>SEX</u>	<u>RACE</u>	<u>HGT</u>	<u>WGT</u>	<u>EYES</u>	<u>HAIR</u>	<u>DRIVER'S LICENSE</u>	<u>STS</u>	<u>COURT DATE</u>
JESUS LOPEZ RAMIREZ	M	H	505	130	Brown	Black		IC	12/31/2024
ALEX BRANDON LOPEZRAMIREZ	M	H	509	130	Brown	Brown	Y9827215	IC	12/31/2024