

THE SUPERIOR COURT, STATE OF CALIFORNIA
For the County of Santa Barbara
Figueroa Division

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

MAY 10 2018

Darrel E. Parker, Executive Officer

BY L. Mendez
L. Mendez, Deputy Clerk

DA No. 18-05-421688

Court No. 18CR04642

THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff,

vs.

JOSEPH JAMES DEANGELO

DOB: 11/08/1945

Defendant.

FELONY COMPLAINT

AB109 INELIGIBLE

The undersigned is informed and believes that:

COUNT 1

On or about July 27, 1981, in the County of Santa Barbara, the crime of MURDER, in violation of **PENAL CODE SECTION 187(a)**, a Felony, was committed by JOSEPH JAMES DEANGELO, who did unlawfully, and with malice aforethought murder CHERI DOMINGO, a human being. It is further alleged that the above offense was **WILLFUL, PREMEDITATED, and DELIBERATE, OR COMMITTED BY MEANS OF LYING IN WAIT** pursuant to Penal Code Section 189.

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)**.

**SPECIAL CIRCUMSTANCE
MULTIPLE MURDER**

It is further alleged that the offense(s) charged in count(s) 1 are a special circumstance indicating a multiple murder that is within the meaning of **PENAL CODE SECTION 190.2(a)(3)**.

**SPECIAL CIRCUMSTANCE
MURDER DURING COMMISSION OF RAPE**

It is further alleged that the murder of CHERI DOMINGO was committed while defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of rape in violation of Penal Code section 261, pursuant to **PENAL CODE SECTION 190.2(a)(17)(C) (PENAL CODE SECTION 190.2(a)(17)(iii)** in effect on July 27, 1981).

**SPECIAL CIRCUMSTANCE
MURDER DURING COMMISSION OF BURGLARY**

It is further alleged that the murder of CHERI DOMINGO was committed while defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of burglary in violation of Penal Code section 459, pursuant to **PENAL CODE SECTION 190.2(a)(17)(G) (PENAL CODE SECTION 190.2(a)(17)(vii)** in effect on July 27, 1981).

COUNT 2

On or about July 27, 1981, in the County of Santa Barbara, the crime of MURDER, in violation of **PENAL CODE SECTION 187(a)**, a Felony, was committed by JOSEPH JAMES DEANGELO, who did unlawfully, and with malice aforethought murder GREG SANCHEZ, a human being. It is further alleged that the above offense was **WILLFUL, PREMEDITATED, and DELIBERATE, OR COMMITTED BY MEANS OF LYING IN WAIT** pursuant to **Penal Code Section 189**.

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)**.

SPECIAL CIRCUMSTANCE MULTIPLE MURDER

It is further alleged that the offense(s) charged in count(s) 2 are a special circumstance indicating a multiple murder that is within the meaning of **PENAL CODE SECTION 190.2(a)(3)**.

SPECIAL CIRCUMSTANCE MURDER DURING COMMISSION OF BURGLARY

It is further alleged that the murder of GREG SANCHEZ was committed while defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of burglary in violation of Penal Code section 459, pursuant to **PENAL CODE SECTION 190.2(a)(17)(G) (PENAL CODE SECTION 190.2(a)(17)(vii)** in effect on July 27, 1981).

SPEC ALLEG-USE OF FIREARM

It is further alleged that in the commission and attempted commission of the above offense(s), the defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, an unknown caliber firearm, within the meaning of **PENAL CODE SECTION 12022.5** also causing the above offense to become a violent felony within the meaning of Penal Code section 667.5(c)(8).

COUNT 3

On or about December 30, 1979, in the County of Santa Barbara, the crime of MURDER, in violation of **PENAL CODE SECTION 187(a)**, a Felony, was committed by JOSEPH JAMES DEANGELO, who did unlawfully, and with malice aforethought murder DEBRA ALEXANDRIA MANNING, a human being. It is further alleged that the above offense was **WILLFUL, PREMEDITATED, and DELIBERATE, OR COMMITTED BY MEANS OF LYING IN WAIT** pursuant to **Penal Code Section 189**.

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)**.

**SPECIAL CIRCUMSTANCE
MULTIPLE MURDER**

It is further alleged that the offense(s) charged in count(s) 3 are a special circumstance indicating a multiple murder that is within the meaning of **PENAL CODE SECTION 190.2(a)(3) (PENAL CODE SECTION 190.2(c)(5)** in effect on December 30, 1979).

**SPECIAL CIRCUMSTANCE
MURDER DURING COMMISSION OF RAPE**

It is further alleged that the murder of DEBRA ALEXANDRIA MANNING was committed while defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of rape in violation of Penal Code section 261, pursuant to **PENAL CODE SECTION 190.2(a)(17)(C) (PENAL CODE SECTION 190.2(c)(3)(iii)** in effect on December 30, 1979).

**SPECIAL CIRCUMSTANCE
MURDER DURING COMMISSION OF BURGLARY**

It is further alleged that the murder of DEBRA ALEXANDRIA MANNING was committed while defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of burglary in violation of Penal Code section 459, pursuant to **PENAL CODE SECTION 190.2(a)(17)(G) (PENAL CODE SECTION 190.2(c)(3)(v)** in effect on December 30, 1979).

SPEC ALLEG-USE OF FIREARM

It is further alleged that in the commission and attempted commission of the above offense(s), the defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, an unknown caliber firearm, within the meaning of **PENAL CODE SECTION 12022.5** also causing the above offense to become a violent felony within the meaning of Penal Code section 667.5(c)(8).

COUNT 4

On or about December 30, 1979, in the County of Santa Barbara, the crime of MURDER, in violation of **PENAL CODE SECTION 187(a)**, a Felony, was committed by JOSEPH JAMES DEANGELO, who did unlawfully, and with malice aforethought murder ROBERT OFFERMAN, a human being. It is further alleged that the above offense was **WILLFUL, PREMEDITATED, and DELIBERATE, OR COMMITTED BY MEANS OF LYING IN WAIT** pursuant to Penal Code Section 189.

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)**.

**SPECIAL CIRCUMSTANCE
MULTIPLE MURDER**

It is further alleged that the offense(s) charged in count(s) 4 are a special circumstance indicating a multiple murder that is within the meaning of **PENAL CODE SECTION 190.2(a)(3) (PENAL CODE SECTION 190.2(c)(5)** in effect on December 30, 1979).

**SPECIAL CIRCUMSTANCE
MURDER DURING COMMISSION OF BURGLARY**

It is further alleged that the murder of ROBERT OFFERMAN was committed while defendant, JOSEPH JAMES DEANGELO, was engaged in the commission and attempted commission of burglary in violation of Penal Code section 459, pursuant to **PENAL CODE SECTION 190.2(a)(17)(G) (PENAL CODE SECTION 190.2(c)(3)(v)** in effect on December 30, 1979).

SPEC ALLEG-USE OF FIREARM

It is further alleged that in the commission and attempted commission of the above offense(s), the defendant, JOSEPH JAMES DEANGELO, personally used a firearm, to wit, an unknown caliber firearm, within the meaning of **PENAL CODE SECTION 12022.5** also causing the above offense to become a violent felony within the meaning of Penal Code section 667.5(c)(8).

SPEC ALLEG – SERIOUS/VIOLENT/REGISTERABLE SEX OFFENSE FELONY

It is further alleged, as to all counts, that the above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and/or a violent felony described in subdivision(s) of Penal Code section 667.5 and/or an offense requiring registration under the provisions Penal Code sections 290 et seq, pursuant to Penal Code section 1170(h), that the defendant is ineligible for a state prison sentence to be served in the county jail.

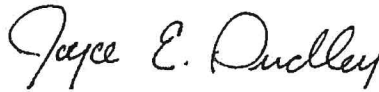
“NOTICE: Pursuant to Penal Code section 1170(f), notwithstanding any other provisions of this section, for purposes of subdivision (h) of section 1170, any allegation that a defendant is ineligible for a state prison sentence to be served in the county jail due to a prior or current conviction, or sentence enhancement, or because he or she is required to register as a sex offender, or because the legislature specifically excluded the offense, shall not be subject to dismissal pursuant to §1385 PC.”

* * * * *

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 4 COUNT(S).

Executed at Santa Barbara, California, on May 9, 2018.



JOYCE DUDLEY
DISTRICT ATTORNEY

Agency: SBSO

<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>
Joseph James Deangelo	M	W	508	230	BLU	BRO	M0109518	AW	