

SUPERIOR COURT OF CALIFORNIA
COUNTY OF HUMBOLDT

PEOPLE OF THE STATE OF CALIFORNIA,	
	Plaintiff,
vs.	
Ulisses Rodriguez,	
	Defendant.

COURT CASE NO. CR 1804051
 FELONY COMPLAINT
 10 8/24

The undersigned is informed and believes that:

COUNT 1

On or about August 14, 2018, in the County of Humboldt, State of California, the crime of Murder, in violation of PC187(a), a Felony, was committed by Ulisses Rodriguez, who did unlawfully, and with malice aforethought murder Tiffany Marie Ellebrecht, 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 August 14, 2018, in the County of Humboldt, State of California, the crime of Murder, in violation of PC187(a), a Felony, was committed by Ulisses Rodriguez, who did unlawfully, and with malice

aforethought murder Jeremy Dieter Kuemmel, 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).

SPECIAL ALLEGATION

PC12022.53(b): Special Allegation - Personal Use Of A Firearm

It is further alleged, as to Count I and Count II, that said defendant, Ulisses Rodriguez, personally used a firearm, within the meaning of Penal Code section 12022.53(b), also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

COUNT 3

On or about August 14, 2018, in the County of Humboldt, State of California, the crime of Criminal Threats, in violation of PC422, a Felony, was committed by Ulisses Rodriguez, who did willfully and unlawfully threaten to commit a crime which would result in death and great bodily injury to John Doe, with the specific intent that the statement be taken as a threat.

It is further alleged that the threatened crime, on its face and under the circumstances in which it was made, was so unequivocal, unconditional, immediate and specific as to convey to John Doe a gravity of purpose and an immediate prospect of execution.

It is further alleged that the said John Doe was reasonably in sustained fear of his safety and the

safety of his immediate family.

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

SPECIAL ALLEGATION

PC12022.5(a): Special Allegation - Use Of Firearm

It is further alleged, as to Count III, that in the commission and attempted commission of the above offense, the said defendant, Ulisses Rodriguez, personally used a firearm, within the meaning of Penal Code sections 1203.06(a)(1) and 12022.5(a), also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

COUNT 4

On or about August 14, 2018, in the County of Humboldt, State of California, the crime of Arson Of Property Of Another, in violation of PC451(d), a Felony, was committed by Ulisses Rodriguez, who did willfully, unlawfully and maliciously set fire to and burn and cause to be burned the property of another, to wit: motor vehicle, located west of the Briceland Thorn Road Junction on the Shelter Cove Road, Humboldt County, CA.

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

NOTICE: Conviction of any of the above felony counts requires relinquishment of firearms, ammunition and ammunition feeding devices.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 4 COUNT(S).

Executed at Eureka, California, on August 24, 2018.

MAGGIE FLEMING, SBN123324

Paul A. Bantich for Maggie Fleming
DECLARANT AND COMPLAINANT