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SPD-19-193994  
J. HIGHTOWER, DDA  
TEAM:  
XRef: 2850371

9 **SUPERIOR COURT OF CALIFORNIA**  
10 **COUNTY OF SACRAMENTO**

11 THE PEOPLE OF THE STATE OF CALIFORNIA,

No. 19FE011057

15 vs.

AMENDED FELONY  
COMPLAINT

17 ADEL SAMBRANO RAMOS,

18 Defendant.

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20 The People of the State of California upon oath of the undersigned, upon information and belief  
21 complain against the defendant above named for the crime(s) as follows:  
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23 **COUNT ONE**

24 On or about June 19, 2019, at and in the County of Sacramento, State of California, the  
25 defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of Section  
26 187(a) of the Penal Code of the State of California, in that said defendant did unlawfully, and  
27 with malice aforethought murder SACRAMENTO POLICE OFFICER TARA O'SULLIVAN,  
28 a human being.  
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31 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section  
32 1192.7(c)."  
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3 **SPECIAL CIRCUMSTANCE**  
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5 **1.**

6 It is further alleged SACRAMENTO POLICE OFFICER TARA O'SULLIVAN that the murder  
7 of the SACRAMENTO POLICE OFFICER TARA O'SULLIVAN was committed by the  
8 defendant, ADEL SAMBRANO RAMOS, and that SACRAMENTO POLICE OFFICER  
9 TARA O'SULLIVAN was a peace officer who was intentionally killed while engaged in the  
10 performance of her duties, and that said defendant knew and reasonably should have known that  
11 SACRAMENTO POLICE OFFICER TARA O'SULLIVAN was a peace officer engaged in the  
12 performance of her duties, within the meaning of Penal Code Section 190.2(a)(7).  
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15 **SPECIAL CIRCUMSTANCE**

16 **2.**

17 It is further alleged that the murder of the SACRAMENTO POLICE OFFICER  
18 TARA O'SULLIVAN was committed by the defendant, ADEL SAMBRANO RAMOS, and that  
19 the defendant intentionally killed the victim while lying in wait, within the meaning of Penal  
20 Code Section 190.2(a)(15).  
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23 It is further alleged that, pursuant to subdivisions (b), (c) and (d) of Penal Code Section  
24 12022.53, and in the commission and attempted commission of the above offense(s), the  
25 defendant, ADEL SAMBRANO RAMOS, used, and intentionally and personally discharged a  
26 firearm , to wit, an unknown caliber firearm, and thereby proximately caused death to  
27 SACRAMENTO POLICE OFFICER TARA O'SULLIVAN, who was not an accomplice of the  
28 defendant, within the meaning of Penal Code Section 12022.53(d).  
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31 **COUNT TWO**

32 For a further and separate cause of action, being a different offense of the same class of crimes  
33 and offenses and connected in its commission with the charges set forth in Count One hereof: On  
34 or about June 19, 2019, at and in the County of Sacramento, State of California, the defendant,  
35 ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of Section 664/187(a)  
36 of the Penal Code of the State of California, in that said defendant did unlawfully, and with  
37 malice aforethought attempt to murder SACRAMENTO POLICE OFFICER DANIEL CHIPP,  
38 a human being.  
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4 "NOTICE: The above offense is a serious and violent felony within the meaning of Penal Code  
5 Sections 1192.7(c)(1) and 667.5(c)(1)."  
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8 It is further alleged that the defendant, ADEL SAMBRANO RAMOS, committed the charged  
9 crime upon a peace officer and the defendant knew or reasonably should have known the victim  
10 was a peace officer engaged in the performance of her duties, within the meaning of Penal Code  
11 Section 664(e)(1).  
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14 It is further alleged that in the commission and attempted commission of the above offense, the  
15 defendant, ADEL SAMBRANO RAMOS, used and intentionally and personally discharged a  
16 firearm, to wit, an unknown caliber firearm, within the meaning of Penal Code Section  
17 12022.53(c).  
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20 **COUNT THREE**

21 For a further and separate cause of action, being a different offense of the same class of crimes  
22 and offenses and connected in its commission with the charges set forth in Counts One and Two  
23 hereof: On or about June 19, 2019, at and in the County of Sacramento, State of California, the  
24 defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of Section  
25 664/187(a) of the Penal Code of the State of California, in that said defendant did unlawfully,  
26 and with malice aforethought attempt to murder SACRAMENTO POLICE OFFICER  
27 DAVID JARRELL, a human being.  
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29 "NOTICE: The above offense is a serious and violent felony within the meaning of Penal Code  
30 Sections 1192.7(c)(1) and 667.5(c)(1)."  
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32 It is further alleged that the defendant, ADEL SAMBRANO RAMOS, committed the charged  
33 crime upon a peace officer and the defendant knew or reasonably should have known the victim  
34 was a peace officer engaged in the performance of his/her duties, within the meaning of Penal  
35 Code Section 664(e)(1).  
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5 It is further alleged that in the commission and attempted commission of the above offense, the  
6 defendant, ADEL SAMBRANO RAMOS, used and intentionally and personally discharged a  
7 firearm, to wit, an unknown caliber firearm, within the meaning of Penal Code Section  
8 12022.53(c).  
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10 **COUNT FOUR**

11 For a further and separate cause of action, being a different offense of the same class of crimes  
12 and offenses and connected in its commission with the charges set forth in Counts One through  
13 Three hereof: On or about June 19, 2019, at and in the County of Sacramento, State of California,  
14 the defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of  
15 Section 664/187(a) of the Penal Code of the State of California, in that said defendant did  
16 unlawfully, and with malice aforethought attempt to murder  
17 SACRAMENTO POLICE OFFICER ANTHONY BOLER, a human being.  
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21 "NOTICE: The above offense is a serious and violent felony within the meaning of Penal Code  
22 Sections 1192.7(c)(1) and 667.5(c)(1)."  
23

24 It is further alleged that the defendant, ADEL SAMBRANO RAMOS, committed the charged  
25 crime upon a peace officer and the defendant knew or reasonably should have known the victim  
26 was a peace officer engaged in the performance of his/her duties, within the meaning of Penal  
27 Code Section 664(e)(1).  
28

29 It is further alleged that in the commission and attempted commission of the above offense, the  
30 defendant, ADEL SAMBRANO RAMOS, used and intentionally and personally discharged a  
31 firearm, to wit, an unknown caliber firearm, within the meaning of Penal Code Section  
32 12022.53(c).  
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4 **COUNT FIVE**

5 For a further and separate cause of action, being a different offense of the same class of crimes  
6 and offenses and connected in its commission with the charges set forth in Counts One through  
7 Four hereof: On or about June 19, 2019, at and in the County of Sacramento, State of California,  
8 the defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of  
9 Section 664/187(a) of the Penal Code of the State of California, in that said defendant did  
10 unlawfully, and with malice aforethought attempt to murder SACRAMENTO POLICE  
11 OFFICER TYLER CURTIS, a human being.  
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14 "NOTICE: The above offense is a serious and violent felony within the meaning of Penal Code  
15 Sections 1192.7(c)(1) and 667.5(c)(1)."  
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18 It is further alleged that the defendant, ADEL SAMBRANO RAMOS, committed the charged  
19 crime upon a peace officer and the defendant knew or reasonably should have known the victim  
20 was a peace officer engaged in the performance of his/her duties, within the meaning of Penal  
21 Code Section 664(e)(1).  
22

23 It is further alleged that in the commission and attempted commission of the above offense, the  
24 defendant, ADEL SAMBRANO RAMOS, used and intentionally and personally discharged a  
25 firearm, to wit, an unknown caliber firearm, within the meaning of Penal Code Section  
26 12022.53(c).  
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29 **COUNT SIX**

30 For a further and separate cause of action, being a different offense of the same class of crimes  
31 and offenses and connected in its commission with the charges set forth in Counts One through  
32 Five hereof: On or about June 19, 2019, at and in the County of Sacramento, State of California,  
33 the defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of  
34 Section 664/187(a) of the Penal Code of the State of California, in that said defendant did  
35 unlawfully, and with malice aforethought attempt to murder SACRAMENTO SHERIFF'S  
36 DEPUTY PAUL FLICK, a human being.  
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4 "NOTICE: The above offense is a serious and violent felony within the meaning of Penal Code  
5 Sections 1192.7(c)(1) and 667.5(c)(1)."  
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8 It is further alleged that the defendant, ADEL SAMBRANO RAMOS, committed the charged  
9 crime upon a peace officer and the defendant knew or reasonably should have known the victim  
10 was a peace officer engaged in the performance of his/her duties, within the meaning of Penal  
11 Code Section 664(e)(1).  
12

13 It is further alleged that in the commission and attempted commission of the above offense, the  
14 defendant, ADEL SAMBRANO RAMOS, used and intentionally and personally discharged a  
15 firearm, to wit, an unknown caliber firearm, within the meaning of Penal Code Section  
16 12022.53(c).  
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19 **COUNT SEVEN**

20 For a further and separate cause of action, being a different offense of the same class of crimes  
21 and offenses and connected in its commission with the charges set forth in Counts One through  
22 Six hereof: On or about June 19, 2019, at and in the County of Sacramento, State of California,  
23 the defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of  
24 Section 664/187(a) of the Penal Code of the State of California, in that said defendant did  
25 unlawfully, and with malice aforethought attempt to murder SACRAMENTO POLICE  
26 OFFICER JEFF MORRIS, a human being.  
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28 "NOTICE: The above offense is a serious and violent felony within the meaning of Penal Code  
29 Sections 1192.7(c)(1) and 667.5(c)(1)."  
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31 It is further alleged that the defendant, ADEL SAMBRANO RAMOS, committed the charged  
32 crime upon a peace officer and the defendant knew or reasonably should have known the victim  
33 was a peace officer engaged in the performance of his/her duties, within the meaning of Penal  
34 Code Section 664(e)(1).  
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5 It is further alleged that in the commission and attempted commission of the above offense, the  
6 defendant, ADEL SAMBRANO RAMOS, used and intentionally and personally discharged a  
7 firearm, to wit, an unknown caliber firearm, within the meaning of Penal Code Section  
8 12022.53(c).  
9

10 **COUNT EIGHT**

11 For a further and separate cause of action, being a different offense of the same class of crimes  
12 and offenses and connected in its commission with the charges set forth in Counts One through  
13 Seven hereof: On or about June 19, 2019, at and in the County of Sacramento, State of  
14 California, the defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a  
15 violation of Section 664/187(a) of the Penal Code of the State of California, in that said  
16 defendant did unlawfully, and with malice aforethought attempt to murder  
17 SACRAMENTO SHERIFF'S DEPUTY STEVEN MURPHY, a human being.  
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20 "NOTICE: The above offense is a serious and violent felony within the meaning of Penal Code  
21 Sections 1192.7(c)(1) and 667.5(c)(1)."  
22

23 It is further alleged that the defendant, ADEL SAMBRANO RAMOS, committed the charged  
24 crime upon a peace officer and the defendant knew or reasonably should have known the victim  
25 was a peace officer engaged in the performance of his/her duties, within the meaning of Penal  
26 Code Section 664(e)(1).  
27

28 It is further alleged that in the commission and attempted commission of the above offense, the  
29 defendant, ADEL SAMBRANO RAMOS, used and intentionally and personally discharged a  
30 firearm, to wit, an unknown caliber firearm, within the meaning of Penal Code Section  
31 12022.53(c).  
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4 **COUNT NINE**

5 For a further and separate cause of action, being a different offense of the same class of crimes  
6 and offenses and connected in its commission with the charges set forth in Counts One through  
7 Eight hereof: On or about June 19, 2019, at and in the County of Sacramento, State of California,  
8 the defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of  
9 Section 30600(a) of the Penal Code of the State of California, in that said defendant did willfully  
10 and unlawfully manufacture, and cause to be manufactured, distribute, transport, import into the  
11 State of California, keep for sale, offer and expose for sale, give and lend an assault weapon,  
12 to wit, AR-15 style 224 Valkyrie caliber semi-automatic rifle without a serial number.  
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16 **COUNT TEN**

17 For a further and separate cause of action, being a different offense of the same class of crimes  
18 and offenses and connected in its commission with the charges set forth in Counts One through  
19 Nine hereof: On or about June 19, 2019, at and in the County of Sacramento, State of California,  
20 the defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of  
21 Section 30600(a) of the Penal Code of the State of California, in that said defendant did willfully  
22 and unlawfully manufacture, and cause to be manufactured, distribute, transport, import into the  
23 State of California, keep for sale, offer and expose for sale, give and lend an assault weapon,  
24 to wit, AR-15 style 5.56x45mm caliber semi-automatic rifle without a serial number.  
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26 **COUNT ELEVEN**

27 For a further and separate cause of action, being a different offense of the same class of crimes  
28 and offenses and connected in its commission with the charges set forth in Counts One through  
29 Ten hereof: On or about June 19, 2019, at and in the County of Sacramento, State of California,  
30 the defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a violation of  
31 Section 32625(b) of the Penal Code of the State of California, in that said defendant did willfully  
32 and unlawfully convert a firearm, to wit, AR-15 style 223 Remington/5.56x45mm (.223 Wylde)  
33 caliber automatic rifle without a serial number, into a machine gun.  
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4 **COUNT TWELVE**

5 For a further and separate cause of action, being a different offense of the same class of crimes  
6 and offenses and connected in its commission with the charges set forth in Counts One through  
7 Eleven hereof: On or about June 19, 2019, at and in the County of Sacramento, State of  
8 California, the defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a  
9 violation of Section 32625(b) of the Penal Code of the State of California, in that said defendant  
10 did willfully and unlawfully convert a firearm, to wit, AR-15 style 5.56x45mm caliber automatic  
11 rifle without a serial number, into a machine gun.  
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14 **COUNT THIRTEEN**

15 For a further and separate cause of action, being a different offense of the same class of crimes  
16 and offenses and connected in its commission with the charges set forth in Counts One through  
17 Twelve hereof: On or about June 19, 2019, at and in the County of Sacramento, State of  
18 California, the defendant, ADEL SAMBRANO RAMOS, did commit a felony, namely: a  
19 violation of Section 32625(b) of the Penal Code of the State of California, in that said defendant  
20 did willfully and unlawfully convert a firearm, to wit, AR-15 style 5.56x45mm caliber automatic  
21 rifle without a serial number, into a machine gun.  
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25 I declare upon information and belief and under penalty of perjury that the foregoing is true and  
26 correct.  
27

28 Executed at Sacramento County, California, the 10th day of January, 2020.  
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34 JEFFREY HIGHTOWER  
35 SACRAMENTO COUNTY DISTRICT ATTORNEY  
36 (916) 874-6218  
37 Telephone Number  
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**HOLDING ORDER**

\_\_\_\_\_ It appearing to me that the offense(s) in the within complaint has/have been committed,  
and that there is sufficient cause to believe that the defendant,  
ADEL SAMBRANO RAMOS, is guilty thereof,

\_\_\_\_\_ The defendant, ADEL SAMBRANO RAMOS, having waived preliminary hearing to the  
offense(s) set forth in this complaint,

Exceptions/Additions/Conditions: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I order that the defendant be held to answer to same. In my capacity as Judge of the Superior  
Court, I deem the within complaint to be an Information and order it filed in the Superior Court.

Date: \_\_\_\_\_ Dept: \_\_\_\_\_

Judge of the Superior Court Sitting as Magistrate

