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FILED
TULARE COUNTY SUPERIOR COURT
VISALIA DIVISION

JUL 26 2017

LARAYNE CLEEK, CLERK
BY: *[Signature]*

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF TULARE

11 PEOPLE OF THE STATE OF
12 CALIFORNIA,

13 Plaintiff,

14 v.

15 QUINTON BROWN [REDACTED] -A
16 GERALD TURNER [REDACTED] -B
17 MIA McNEIL [REDACTED] -C

18 Defendants.

Case No. VCF 353621 - A,B,C

AMENDED FELONY COMPLAINT

Action Filed: July 20, 2017

19 THE ATTORNEY GENERAL OF THE STATE OF CALIFORNIA accuses the above-
20 named Defendants of the following crimes, which are connected to one another in their
21 commission:

22 COUNT ONE

23 On or about October 5, 2016, in the County of Tulare, defendant QUINTON BROWN
24 committed the crime of PANDERING BY PROCURING A MINOR 16 YEARS OF AGE OR
25 OLDER, in violation of PENAL CODE SECTION 266i(b)(1), a Felony, in that he did unlawfully
26 procure DELANEY S., another person who was a minor the age of sixteen years or over, for the
27 purpose of prostitution.

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1 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

2 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
3 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

4 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
5 Code section 290 et seq. Willful failure to register is a crime.

6 **COUNT TWO**

7 On or between October 21, 2016, and January 12, 2017, in the County of Tulare, California
8 defendant QUINTON BROWN committed the crime of PIMPING A MINOR 16 YEARS OF
9 AGE OR OLDER, in violation of PENAL CODE SECTION 266h(b)(1), a Felony, in that he did
10 unlawfully, and knowing [REDACTED], a minor sixteen years of age or older, was a prostitute,
11 live or derive support or maintenance in whole or in part from the earnings or proceeds of
12 [REDACTED] or from money loaned or advanced to or charged against [REDACTED] by a
13 keeper, manager, or inmate of a house or other place where prostitution was practiced or allowed,
14 or did solicit or receive compensation for soliciting [REDACTED]

15 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

16 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
17 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

18 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
19 Code section 290 et seq. Willful failure to register is a crime.

20 **COUNT THREE**

21 On or about October 5, 2016, in the County of Tulare, defendant QUINTON BROWN
22 committed the crime of HUMAN TRAFFICKING OF A MINOR FOR A SEX ACT, in violation
23 of PENAL CODE SECTION 236.1(c)(1), a Felony, in that he did willfully and unlawfully cause,
24 induce, and/or persuade [REDACTED], who was less than 18 years of age, to engage in a
25 commercial sex act, with the intent to effect and/or maintain a violation of PENAL CODE
26 SECTION 266i(b)(1).

27 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
28 Code section 290 et seq. Willful failure to register is a crime.

1 COUNT FOUR

2 On or between October 21, 2016, and January 12, 2017, in the County of Tulare, defendant
3 QUINTON BROWN committed the crime of HUMAN TRAFFICKING OF A MINOR FOR A
4 SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a Felony, in that he did
5 willfully and unlawfully cause, induce, and/or persuade [REDACTED] who was less than 18
6 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a
7 violation of PENAL CODE SECTION 266h(b)(1).

8 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
9 Code section 290 et seq. Willful failure to register is a crime.

10 COUNT FIVE

11 On or between December 1, 2016, and March 31, 2017, in the County of Los Angeles,
12 defendant QUINTON BROWN committed the crime of UNLAWFUL SEXUAL
13 INTERCOURSE, a violation of PENAL CODE SECTION 261.5(c), a Felony, in that he did
14 engage in an act of unlawful sexual intercourse with [REDACTED], a minor who was more than
15 three years younger than the defendant.

16 COUNT SIX

17 On or about November 16, 2016, in the County of Kern, defendants QUINTON BROWN
18 and GERALD TURNER committed the crime of PANDERING BY PROCURING A MINOR
19 UNDER 16 YEARS OF AGE, in violation of PENAL CODE SECTION 266i(b)(2), a Felony, in
20 that they did unlawfully procure [REDACTED] another person who was a minor under the age of
21 16, for the purpose of prostitution.

22 SPECIAL ALLEGATION – VIOLENT SEX OFFENSES

23 It is further alleged that defendants QUINTON BROWN and GERALD TURNER are
24 ineligible for probation or suspension of sentence pursuant to PENAL CODE SECTION
25 1203.065(a).

26 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
27 Code section 290 et seq. Willful failure to register is a crime.

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1 willfully and unlawfully cause, induce, and/or persuade FOREVER B., who was less than 18
2 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a
3 violation of PENAL CODE SECTION 266h(b)(1).

4 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
5 Code section 290 et seq. Willful failure to register is a crime.

6 COUNT TEN

7 On or about November 16, 2016, in the County of Kern, defendants QUINTON BROWN
8 and GERALD TURNER committed the crime of PANDERING BY PROCURING A MINOR
9 OVER AGE 16, a violation of PENAL CODE SECTION 266i(b)(1), a Felony, in that they did
10 unlawfully procure [REDACTED] another person who was a minor over the age of sixteen years, for
11 the purpose of prostitution.

12 SPECIAL ALLEGATION – VIOLENT SEX OFFENSES

13 It is further alleged that defendants QUINTON BROWN and GERALD TURNER are
14 ineligible for probation or suspension of sentence pursuant to PENAL CODE SECTION
15 1203.065(a).

16 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
17 Code section 290 et seq. Willful failure to register is a crime.

18 COUNT ELEVEN

19 On or between October 1, 2015 and October 15, 2015, in the County of Kern, defendants
20 QUINTON BROWN and GERALD TURNER committed the crime of HUMAN TRAFFICKING
21 OF A MINOR FOR A SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a
22 Felony, in that they did willfully and unlawfully attempt to cause, induce, and/or persuade [REDACTED]
23 [REDACTED] who was less than 18 years of age, to engage in a commercial sex act, with the intent to effect
24 and/or maintain a violation of PENAL CODE SECTION 266i(b)(1).

25 NOTICE: Conviction of this offense will require the defendants to register pursuant to Penal
26 Code section 290 et seq. Willful failure to register is a crime.

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1 COUNT TWELVE

2 On or between December 31, 2016, and May 22, 2017, in the County of Los Angeles,
3 defendant QUINTON BROWN committed the crime of PIMPING A MINOR 16 YEARS OF
4 AGE OR OLDER, in violation of PENAL CODE SECTION 266h(b)(1), a Felony, in that he did
5 unlawfully, and knowing [REDACTED], a minor sixteen years of age or older, was a prostitute, live or
6 derive support or maintenance in whole or in part from the earnings or proceeds of [REDACTED] or
7 from money loaned or advanced to or charged against [REDACTED] by a keeper, manager, or inmate
8 of a house or other place where prostitution was practiced or allowed, or did solicit or receive
9 compensation for soliciting [REDACTED].

10 SPECIAL ALLEGATION – VIOLENT SEX OFFENSES

11 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
12 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

13 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
14 Code section 290 et seq. Willful failure to register is a crime.

15 COUNT THIRTEEN

16 On or between November 1, 2016, and December 31, 2016, in the County of Kern,
17 defendant QUINTON BROWN committed the crime of HUMAN TRAFFICKING OF A
18 MINOR FOR A SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a Felony, in
19 that he did willfully and unlawfully cause, induce, and/or persuade [REDACTED], who was less than
20 18 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a
21 violation of PENAL CODE SECTION 266i(b)(1).

22 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
23 Code section 290 et seq. Willful failure to register is a crime.

24 COUNT FOURTEEN

25 On or between December 31, 2016, and May 22, 2017, in the County of Los Angeles,
26 defendant QUINTON BROWN committed the crime of HUMAN TRAFFICKING OF A
27 MINOR FOR A SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a Felony, in
28 that he did willfully and unlawfully cause, induce, and/or persuade [REDACTED], who was less than

1 18 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a
2 violation of PENAL CODE SECTION 266h(b)(1).

3 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
4 Code section 290 et seq. Willful failure to register is a crime.

5 **COUNT FIFTEEN**

6 On or between December 1, 2016, and March 31, 2017, in the County of Los Angeles,
7 defendant QUINTON BROWN committed the crime of UNLAWFUL SEXUAL
8 INTERCOURSE, in violation of PENAL CODE SECTION 261.5(c), a Felony, in that he did
9 engage in an act of unlawful sexual intercourse with [REDACTED], a minor who was more than three
10 years younger than the defendant.

11 **COUNT SIXTEEN**

12 On or between October 15, 2016, and November 15, 2016, in the County of Tulare,
13 defendant QUINTON BROWN committed the crime of PANDERING BY PROCURING A
14 MINOR 16 YEARS OF AGE OR OLDER, in violation of PENAL CODE SECTION 266i(b)(1),
15 a Felony, in that he did unlawfully procure [REDACTED] another person who was a minor the age of
16 sixteen years or over, for the purpose of prostitution.

17 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

18 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
19 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

20 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
21 Code section 290 et seq. Willful failure to register is a crime.

22 **COUNT SEVENTEEN**

23 On or between October 15, 2016, and November 15, 2016, in the County of Tulare,
24 defendant QUINTON BROWN committed the crime of HUMAN TRAFFICKING OF A
25 MINOR FOR A SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a Felony, in
26 that he did willfully and unlawfully attempt to cause, induce, and/or persuade [REDACTED], who was
27 less than 18 years of age, to engage in a commercial sex act, with the intent to effect and/or
28 maintain a violation of PENAL CODE SECTION 266i(b)(1).

1 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
2 Code section 290 et seq. Willful failure to register is a crime.

3 COUNT EIGHTEEN

4 On or between November 1, 2016, and November 30, 2016, in the County of Tulare,
5 defendant QUINTON BROWN committed the crime of PANDERING BY PROCURING A
6 MINOR 16 YEARS OF AGE OR OLDER, in violation of PENAL CODE SECTION 266i(b)(1),
7 a Felony, in that he did unlawfully procure [REDACTED], another person who was a minor the age
8 of sixteen years or over, for the purpose of prostitution.

9 SPECIAL ALLEGATION – VIOLENT SEX OFFENSES

10 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
11 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

12 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
13 Code section 290 et seq. Willful failure to register is a crime.

14 COUNT NINETEEN

15 On or between November 30, 2016, and February 28, 2017, in the County of Tulare,
16 QUINTON BROWN committed the crime of PIMPING A MINOR 16 YEARS OF AGE OR
17 OLDER, in violation of PENAL CODE SECTION 266h(b)(1), a Felony, in that he did
18 unlawfully, and knowing JORDIN P., a minor sixteen years of age or older, was a prostitute, live
19 or derive support or maintenance in whole or in part from the earnings or proceeds of [REDACTED],
20 or from money loaned or advanced to or charged against [REDACTED] by a keeper, manager, or
21 inmate of a house or other place where prostitution was practiced or allowed, or did solicit or
22 receive compensation for soliciting [REDACTED]

23 SPECIAL ALLEGATION – VIOLENT SEX OFFENSES

24 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
25 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

26 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
27 Code section 290 et seq. Willful failure to register is a crime.

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1 COUNT TWENTY

2 On or between November 1, 2016, and November 30, 2016, in the County of Tulare,
3 defendant QUINTON BROWN committed the crime of HUMAN TRAFFICKING OF A
4 MINOR FOR A SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a Felony, in
5 that he did willfully and unlawfully deprive and/or violate the personal liberty of [REDACTED] with
6 the intent to effect and/or maintain a violation of PENAL CODE section 266i(b)(1).

7 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
8 Code section 290 et seq. Willful failure to register is a crime.

9 COUNT TWENTY-ONE

10 On or between November 30, 2016, and February 28, 2017, in the County of Tulare,
11 defendant QUINTON BROWN committed the crime of HUMAN TRAFFICKING OF A
12 MINOR FOR A SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a Felony, in
13 that he did willfully and unlawfully deprive and/or violate the personal liberty of [REDACTED] with
14 the intent to effect and/or maintain a violation of PENAL CODE section 266h(b)(1).

15 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
16 Code section 290 et seq. Willful failure to register is a crime.

17 COUNT TWENTY-TWO

18 On or between November 1, 2016, and December 31, 2016, in the County of Monterey,
19 defendant QUINTON BROWN committed the crime of UNLAWFUL SEXUAL
20 INTERCOURSE, a violation of PENAL CODE SECTION 261.5(c), a Felony, in that he did
21 engage in an act of unlawful sexual intercourse with [REDACTED], a minor who was more than
22 three years younger than the defendant.

23 COUNT TWENTY-THREE

24 On or about November 28, 2016, in the County of Tulare, defendant QUINTON BROWN
25 committed the crime of PANDERING BY PROCURING A MINOR 16 YEARS OF AGE OR
26 OLDER, in violation of PENAL CODE SECTION 266i(b)(1), a Felony, in that he did unlawfully
27 procure [REDACTED] another person who was a minor the age of sixteen years or over, for
28 the purpose of prostitution.

1 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

2 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
3 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

4 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
5 Code section 290 et seq. Willful failure to register is a crime.

6 **COUNT TWENTY-FOUR**

7 On or between November 28, 2016, and December 15, 2016, in the County of Tulare,
8 California defendant QUINTON BROWN committed the crime of PIMPING A MINOR 16
9 YEARS OF AGE OR OLDER, in violation of PENAL CODE SECTION 266h(b)(1), a Felony, in
10 that he did unlawfully, and knowing [REDACTED] a minor sixteen years of age or older, was
11 a prostitute, live or derive support or maintenance in whole or in part from the earnings or
12 proceeds of [REDACTED], or from money loaned or advanced to or charged against
13 [REDACTED] by a keeper, manager, or inmate of a house or other place where prostitution
14 was practiced or allowed, or did solicit or receive compensation for soliciting [REDACTED]

15 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

16 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
17 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

18 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
19 Code section 290 et seq. Willful failure to register is a crime.

20 **COUNT TWENTY-FIVE**

21 On or about November 28, 2016, in the County of Tulare, defendant QUINTON BROWN
22 committed the crime of HUMAN TRAFFICKING OF A MINOR FOR A SEX ACT, in violation
23 of PENAL CODE SECTION 236.1(c)(1), a Felony, in that he did willfully and unlawfully cause,
24 induce, and/or persuade [REDACTED], who was less than 18 years of age, to engage in a
25 commercial sex act, with the intent to effect and/or maintain a violation of PENAL CODE
26 SECTION 266i(b)(1).

27 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
28 Code section 290 et seq. Willful failure to register is a crime.

1 COUNT TWENTY-SIX

2 On or between November 28, 2016, and December 15, 2016, in the County of Tulare,
3 defendant QUINTON BROWN committed the crime of HUMAN TRAFFICKING OF A
4 MINOR FOR A SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a Felony, in
5 that he did willfully and unlawfully cause, induce, and/or persuade [REDACTED] who was
6 less than 18 years of age, to engage in a commercial sex act, with the intent to effect and/or
7 maintain a violation of PENAL CODE SECTION 266h(b)(1).

8 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
9 Code section 290 et seq. Willful failure to register is a crime.

10 COUNT TWENTY-SEVEN

11 On or about November 1, 2016, and November 30, 2016, in the County of Tulare,
12 defendant QUINTON BROWN committed the crime of PANDERING BY PROCURING A
13 MINOR 16 YEARS OF AGE OR OLDER, in violation of PENAL CODE SECTION 266i(b)(1),
14 a Felony, in that he did unlawfully procure [REDACTED], another person who was a minor the
15 age of sixteen years or over, for the purpose of prostitution.

16 SPECIAL ALLEGATION – VIOLENT SEX OFFENSES

17 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
18 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

19 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
20 Code section 290 et seq. Willful failure to register is a crime.

21 COUNT TWENTY-EIGHT

22 On or between November 30, 2016, and March 15, 2017, in the County of Los Angeles,
23 California defendant QUINTON BROWN committed the crime of PIMPING A MINOR 16
24 YEARS OF AGE OR OLDER, in violation of PENAL CODE SECTION 266h(b)(1), a Felony, in
25 that he did unlawfully, and knowing [REDACTED], a minor sixteen years of age or older, was a
26 prostitute, live or derive support or maintenance in whole or in part from the earnings or proceeds
27 of [REDACTED], or from money loaned or advanced to or charged against [REDACTED] by a
28

1 keeper, manager, or inmate of a house or other place where prostitution was practiced or allowed,
2 or did solicit or receive compensation for soliciting [REDACTED]

3 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

4 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
5 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

6 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
7 Code section 290 et seq. Willful failure to register is a crime.

8 **COUNT TWENTY-NINE**

9 On or about November 1, 2016, and November 30, 2016, in the County of Tulare,
10 defendant QUINTON BROWN committed the crime of HUMAN TRAFFICKING OF A
11 MINOR FOR A SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a Felony, in
12 that he did willfully and unlawfully cause, induce, and/or persuade [REDACTED], who was less
13 than 18 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a
14 violation of PENAL CODE SECTION 266i(b)(1).

15 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
16 Code section 290 et seq. Willful failure to register is a crime.

17 **COUNT THIRTY**

18 On or between November 30, 2016, and January 31, 2017, in the County of Los Angeles,
19 defendant QUINTON BROWN committed the crime of HUMAN TRAFFICKING OF A
20 MINOR FOR A SEX ACT, in violation of PENAL CODE SECTION 236.1(c)(1), a Felony, in
21 that he did willfully and unlawfully cause, induce, and/or persuade [REDACTED] who was less
22 than 18 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a
23 violation of PENAL CODE SECTION 266h(b)(1).

24 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
25 Code section 290 et seq. Willful failure to register is a crime.

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1 COUNT THIRTY-ONE

2 On or about November 12, 2016, in the County of Fresno, defendant QUINTON BROWN
3 committed the crime of PANDERING BY PROCURING, in violation of PENAL CODE
4 SECTION 266i(a)(1), a Felony, in that he did unlawfully procure [REDACTED] another person,
5 for the purpose of prostitution.

6 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

7 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
8 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

9 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
10 Code section 290 et seq. Willful failure to register is a crime.

11 COUNT THIRTY-TWO

12 On or between November 13, 2016, and February 25, 2017, in the County of Los Angeles,
13 California defendant QUINTON BROWN committed the crime of PIMPING, in violation of
14 PENAL CODE SECTION 266h(a), a Felony, in that he did unlawfully, and knowing [REDACTED]
15 [REDACTED] to be a prostitute, live or derive support or maintenance in whole or in part from the earnings
16 or proceeds of [REDACTED], or from money loaned or advanced to or charged against [REDACTED]
17 [REDACTED] by a keeper, manager, or inmate of a house or other place where prostitution was practiced or
18 allowed, or did solicit or receive compensation for soliciting [REDACTED]

19 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

20 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
21 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

22 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
23 Code section 290 et seq. Willful failure to register is a crime.

24 COUNT THIRTY-THREE

25 On or about October 5, 2016, in the County of Tulare, defendant QUINTON BROWN
26 committed the crime of PANDERING BY PROCURING, in violation of PENAL CODE
27 SECTION 266i(a)(1), a Felony, in that he did unlawfully procure [REDACTED] another person,
28 for the purpose of prostitution.

1 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

2 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
3 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

4 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
5 Code section 290 et seq. Willful failure to register is a crime.

6 **COUNT THIRTY-FOUR**

7 On or between October 5, 2016, and January 15, 2017, in the County of Los Angeles,
8 California defendant QUINTON BROWN committed the crime of PIMPING, in violation of
9 PENAL CODE SECTION 266h(a), a Felony, in that he did unlawfully, and knowing [REDACTED]
10 [REDACTED] to be a prostitute, live or derive support or maintenance in whole or in part from the earnings
11 or proceeds of [REDACTED], or from money loaned or advanced to or charged against [REDACTED]
12 [REDACTED] by a keeper, manager, or inmate of a house or other place where prostitution was practiced or
13 allowed, or did solicit or receive compensation for soliciting [REDACTED]

14 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

15 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
16 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

17 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
18 Code section 290 et seq. Willful failure to register is a crime.

19 **COUNT THIRTY-FIVE**

20 On or between March 1, 2016, and March 31, 2016, in the County of Fresno, defendant
21 QUINTON BROWN committed the crime of PANDERING BY PROCURING, in violation of
22 PENAL CODE SECTION 266i(a)(1), a Felony, in that he did unlawfully procure [REDACTED],
23 another person, for the purpose of prostitution.

24 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

25 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
26 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

27 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
28 Code section 290 et seq. Willful failure to register is a crime.

1 COUNT THIRTY-SIX

2 On or between April 1, 2016, and November 17, 2016, in the County of Los Angeles,
3 California defendant QUINTON BROWN committed the crime of PIMPING, in violation of
4 PENAL CODE SECTION 266h(a), a Felony, in that he did unlawfully, and knowing [REDACTED]
5 [REDACTED] to be a prostitute, live or derive support or maintenance in whole or in part from the earnings or
6 proceeds of [REDACTED] or from money loaned or advanced to or charged against [REDACTED]
7 by a keeper, manager, or inmate of a house or other place where prostitution was practiced or
8 allowed, or did solicit or receive compensation for soliciting [REDACTED]

9 SPECIAL ALLEGATION - VIOLENT SEX OFFENSES

10 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
11 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

12 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
13 Code section 290 et seq. Willful failure to register is a crime.

14 COUNT THIRTY-SEVEN

15 On or between November 1, 2016, and November 18, 2016, in the County of Tulare,
16 defendant QUINTON BROWN committed the crime of PANDERING BY PROCURING, in
17 violation of PENAL CODE SECTION 266i(a)(1), a Felony, in that he did unlawfully procure
18 [REDACTED] another person, for the purpose of prostitution.

19 SPECIAL ALLEGATION - VIOLENT SEX OFFENSES

20 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
21 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

22 NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal
23 Code section 290 et seq. Willful failure to register is a crime.

24 COUNT THIRTY-EIGHT

25 On or between November 8, 2016, and March 31, 2017, in the County of Los Angeles,
26 defendant QUINTON BROWN committed the crime of PIMPING, in violation of PENAL CODE
27 SECTION 266h(a), a Felony, in that he did unlawfully, and knowing [REDACTED] to be a
28 prostitute, live or derive support or maintenance in whole or in part from the earnings or proceeds

1 of [REDACTED] or from money loaned or advanced to or charged against [REDACTED] by a
2 keeper, manager, or inmate of a house or other place where prostitution was practiced or allowed,
3 or did solicit or receive compensation for soliciting [REDACTED]

4 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

5 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
6 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

7 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
8 Code section 290 et seq. Willful failure to register is a crime.

9 **COUNT THIRTY-NINE**

10 On or between November 1, 2016, and November 25, 2016, in the County of Kern,
11 defendant QUINTON BROWN committed the crime of PANDERING BY PROCURING, in
12 violation of PENAL CODE SECTION 266i(a)(1), a Felony, in that he did unlawfully procure
13 [REDACTED], another person, for the purpose of prostitution.

14 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

15 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
16 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

17 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
18 Code section 290 et seq. Willful failure to register is a crime.

19 **COUNT FORTY**

20 On or between November 28, 2016, and April 30, 2017, in the County of Kern, defendant
21 QUINTON BROWN committed the crime of PIMPING, in violation of PENAL CODE
22 SECTION 266h(a), a Felony, in that he did unlawfully, and knowing [REDACTED] to be a
23 prostitute, live or derive support or maintenance in whole or in part from the earnings or proceeds
24 of [REDACTED], or from money loaned or advanced to or charged against [REDACTED] by a
25 keeper, manager, or inmate of a house or other place where prostitution was practiced or allowed,
26 or did solicit or receive compensation for soliciting [REDACTED]

27 //

28 //

1 **SPECIAL ALLEGATION – VIOLENT SEX OFFENSES**

2 It is further alleged that defendant QUINTON BROWN is ineligible for probation or
3 suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

4 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to Penal
5 Code section 290 et seq. Willful failure to register is a crime.

6 **COUNT FORTY-ONE**

7 On or about December 1, 2016, in the County of Tulare, defendant MIA MCNEIL
8 committed the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(d)(1), in
9 that she did unlawfully take an automobile, a white 4-door Maserati GSI, exceeding \$950 in
10 value.

11 **COUNT FORTY-TWO**

12 On or about December 1, 2016, in the County of Los Angeles, defendant MIA MCNEIL
13 committed the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5, a
14 Felony, in that she did willfully and unlawfully obtain personal identifying information of [REDACTED]
15 [REDACTED] and used that information for an unlawful purpose and to obtain or attempt to
16 obtain credit, goods, services, real property, or medical information to wit, a vehicle sale contract;
17 without the consent of [REDACTED]

18 **COUNT FORTY-THREE**

19 On or about December 1, 2016, in the County of Tulare, defendant QUINTON BROWN
20 committed the crime of RECEIVING STOLEN PROPERTY – MOTOR VEHICLE, in violation
21 of PENAL CODE SECTION 496d(a), in that he did unlawfully buy or receive a white 4-door
22 Maserati GSI that was stolen or had been obtained in a manner constituting theft or extortion,
23 knowing the property to be stolen or obtained, and did conceal, sell, withhold, or aid in
24 concealing, selling or withholding said property.

25 **COUNT FORTY-FOUR**

26 On or about December 14, 2016, in the County of Los Angeles, defendant MIA MCNEIL
27 committed the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(d)(1), in
28 that she did unlawfully take an automobile, a white Porsche Panamera, exceeding \$950 in value.

1 COUNT FORTY-FIVE

2 On or about December 14, 2016, in the County of Los Angeles, defendant MIA MCNEIL
3 committed the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5, a
4 Felony, in that she did willfully and unlawfully obtain personal identifying information of [REDACTED]
5 [REDACTED] and used that information for an unlawful purpose and to obtain or attempt to
6 obtain credit, goods, services, real property, or medical information, to wit, a vehicle sale contract
7 without the consent of [REDACTED]

8 COUNT FORTY-SIX

9 On or about December 14, 2016, in the County of Los Angeles, defendant MIA MCNEIL
10 committed the crime of RECEIVING STOLEN PROPERTY – MOTOR VEHICLE, in violation
11 of PENAL CODE SECTION 496d(a), in that she did unlawfully buy or receive a white Porsche
12 Panamera that was stolen or had been obtained in a manner constituting theft or extortion,
13 knowing the property to be stolen or obtained, and did conceal, sell, withhold, or aid in
14 concealing, selling or withholding said property.

15 COUNT FORTY-SEVEN

16 On or about March 25, 2017, in the County of Tulare, defendants QUINTON BROWN and
17 MIA MCNEIL committed the crime of GRAND THEFT, in violation of PENAL CODE
18 SECTION 487(d)(1), in that they did unlawfully take an automobile, a red 4-door Maserati
19 Levante, exceeding \$950 in value.

20 COUNT FORTY-EIGHT

21 On or about March 25, 2017, in the County of Los Angeles, defendant MIA MCNEIL
22 committed the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5, a
23 Felony, in that she did that willfully and unlawfully obtain personal identifying information of
24 [REDACTED] and used that information for an unlawful purpose and to obtain or
25 attempt to obtain credit, goods, services, real property, or medical information, to wit a vehicle
26 lease, without the consent of [REDACTED]

27 //

28 //

1 COUNT FORTY-NINE

2 On or about March 25, 2017, in the County of Tulare, defendant QUINTON BROWN
3 committed the crime of RECEIVING STOLEN PROPERTY – MOTOR VEHICLE, in violation
4 of PENAL CODE SECTION 496d(a), in that he did unlawfully buy or receive a red 4-door
5 Maserati Levante that was stolen or had been obtained in a manner constituting theft or extortion,
6 knowing the property to be stolen or obtained, and did conceal, sell, withhold, or aid in
7 concealing, selling or withholding said property.

8 COUNT FIFTY

9 On or about April 10, 2017, in the County of Los Angeles, defendant MIA MCNEIL
10 committed the crime of ATTEMPTED GRAND THEFT, in violation of PENAL CODE
11 SECTION 664/487(d)(1), in that she did unlawfully attempt to take an automobile, a 4-door
12 Maserati Levante, exceeding \$950 in value.

13 COUNT FIFTY-ONE

14 On or about April 10, 2017, in the County of Los Angeles, defendant MIA MCNEIL
15 committed the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5, a
16 Felony, in that she did willfully and unlawfully obtain personal identifying information of
17 [REDACTED] and used that information for an unlawful purpose and to obtain or
18 attempt to obtain credit, goods, services, real property, or medical information, to wit, a vehicle
19 sale contract, without the consent of [REDACTED]

20 COUNT FIFTY-TWO

21 On or about April 10, 2017, in the County of Los Angeles, defendant MIA MCNEIL
22 committed the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5, a
23 Felony, in that she did willfully and unlawfully obtain personal identifying information of
24 [REDACTED] and used that information for an unlawful purpose and to obtain or
25 attempt to obtain credit, goods, services, real property, or medical information, to wit, a vehicle
26 sale contract, without the consent of [REDACTED]

27 //

28 //

1 COUNT FIFTY-THREE

2 On or about October 10, 2016, in the County of Los Angeles, defendant MIA MCNEIL
3 committed the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5, a
4 Felony, in that she did willfully and unlawfully obtain personal identifying information of
5 [REDACTED] and used that information for an unlawful purpose and to obtain or attempt
6 to obtain credit, goods, services, real property, or medical information, to wit, a residential lease,
7 without the consent of [REDACTED]

8 COUNT FIFTY-FOUR

9 On or about February 14, 2017, in the County of Los Angeles, defendant MIA MCNEIL
10 committed the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5, a
11 Felony, in that she did willfully and unlawfully obtain personal identifying information of
12 [REDACTED] and used that information for an unlawful purpose and to obtain or
13 attempt to obtain credit, goods, services, real property, or medical information, a residential lease,
14 without the consent of [REDACTED]

15
16 SPECIAL ALLEGATION – STRIKE PRIOR – ONE OR MORE SERIOUS OR
17 VIOLENT FELONY CONVICTIONS AND CURRENT CHARGE IS ANY FELONY

18 It is further alleged that prior to the commission of the offenses alleged in Counts 1 through
19 54, defendant QUINTON BROWN had been convicted of the following serious and/or violent
20 felony as defined in Penal Code section 667(d) and Penal Code section 1170.12(b), and is thus
21 subject to sentencing pursuant to the provisions of Penal Code section 667(b)-(j) and Penal Code
22 section 1170.12;

| 23 | Date | Court | Case No. | Charge |
|----|----------|-----------|-----------|--------|
| 24 | 10/01/07 | San Diego | SCS198196 | PC 211 |

25
26 SPECIAL ALLEGATION – PRISON PRIOR – ANY FELONY

27 It is further alleged pursuant to PENAL CODE SECTION 667.5(b) that defendant
28 QUINTON BROWN has suffered the following prior conviction and that a term was served as

described in Penal Code section 667.5(b) for said offense, and the defendant did not remain free of prison custody for, and did commit an offense resulting in a felony conviction during, a period of five years subsequent to the conclusion of said term:

| Date | Court | Case No. | Charge |
|---------|-----------|-----------|-------------|
| 1/19/10 | San Diego | SCD221426 | PC 11352(a) |

SPECIAL ALLEGATION – STRIKE PRIOR – ONE OR MORE SERIOUS OR VIOLENT FELONY CONVICTIONS AND CURRENT CHARGE IS ANY FELONY

It is further alleged that prior to the commission of the offenses alleged in Counts 6 through 11, defendant GERALD TURNER had been convicted of the following serious and/or violent felonies as defined in Penal Code section 667(d) and Penal Code section 1170.12(b), and is thus subject to sentencing pursuant to the provisions of Penal Code section 667(b)-(j) and Penal Code section 1170.12:

| Date | Court | Case No. | Charge |
|----------|--------|----------|--------|
| 11/20/07 | Orange | 07CF1408 | PC 211 |
| 11/20/07 | Orange | 07CF1408 | PC 245 |

SPECIAL ALLEGATION – PRISON PRIOR – ANY FELONY

It is further alleged pursuant to PENAL CODE SECTION 667.5(b) that defendant GERALD TURNER has suffered the following prior conviction and that a term was served as described in Penal Code section 667.5(b) for said offense, and the defendant did not remain free of prison custody for, and did commit an offense resulting in a felony conviction during, a period of five years subsequent to the conclusion of said term:

| Date | Court | Case No. | Charge |
|---------|----------|----------|------------|
| 3/16/10 | Mariposa | 8390A | PC 4530(b) |

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1 SPECIAL ALLEGATION – PRISON PRIOR – ANY FELONY

2 It is further alleged pursuant to PENAL CODE SECTION 667.5(b) that defendant
3 GERALD TURNER has suffered the following prior conviction and that a term was served as
4 described in Penal Code section 667.5(b) for said offense, and the defendant did not remain free
5 of prison custody for, and did commit an offense resulting in a felony conviction during, a period
6 of five years subsequent to the conclusion of said term:

| 7 Date | Court | Case No. | Charge |
|----------------------|----------|----------|-----------|
| 8 1/17/12 | Tuolumne | CRF36699 | PC 4573.6 |

9
10 SPECIAL ALLEGATION – PRISON PRIOR – ANY FELONY

11 It is further alleged pursuant to PENAL CODE SECTION 667.5(b) that defendant MIA
12 MCNEIL has suffered the following prior conviction and that a term was served as described in
13 Penal Code section 667.5(b) for said offense, and the defendant did not remain free of prison
14 custody for, and did commit an offense resulting in a felony conviction during, a period of five
15 years subsequent to the conclusion of said term:

| 17 Date | Court | Case No. | Charge |
|----------------------|-------------|---------------|-------------|
| 18 6/03/13 | Los Angeles | XNWLA07252601 | PC 530.5(a) |

19
20 SPECIAL ALLEGATION – STATUS ALLEGATION/FELONIES EXEMPT
21 FROM LOCAL CUSTODY

22 It is further alleged that as to defendants QUINTON BROWN AND GERALD TURNER
23 prison custody time for the above felony offenses is to be served in state prison pursuant to
24 PENAL CODE SECTION 1170.

25
26 NOTICE: Conviction of these offenses will require the defendant to provide DNA samples and
27 print impressions pursuant to Penal Code section 296 and 296.1. Willful refusal to provide the
28 samples and impressions is a crime.

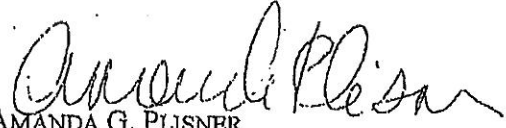
1 NOTICE: The People of the State of California intend to present evidence and seek jury findings
2 regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b)
3 and *Cunningham v. California* (2007) 549 U.S. 270 [127 S.Ct. 856, 166 L.Ed.2d 856].

4 NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the
5 county jail shall not be subject to dismissal pursuant to Penal Code section 1385.

6
7 I declare under the penalty of perjury that the foregoing is true and correct. Executed this
8 26 day of July, 2017, at Los Angeles, California.

9 Respectfully Submitted,

10 XAVIER BECERRA
11 Attorney General of California
12 MAGGY KRELL
13 Supervising Deputy Attorney General

14 
15 AMANDA G. PLISNER
16 Deputy Attorney General
17 Attorneys for People of the State of
18 California

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