

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

THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff,

vs.

BRANDON SCOTT WOODWARD

DOB: 10/13/1997

Defendant.

DA No. 17-08-407252  
Court No.

FELONY COMPLAINT  
FILED  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA BARBARA  
AB109 INELIGIBLE

AUG 21 2017

The undersigned is informed and believes that:

COUNT 1

Darrel E. Parker, Executive Officer  
BY R. PALMER  
Deputy Clerk

On or about June 26, 2017, in the County of Santa Barbara, the crime of GROSS VEHICULAR MANSLAUGHTER WHILE INTOXICATED, in violation of **PENAL CODE SECTION 191.5(a)**, a Felony, was committed by BRANDON SCOTT WOODWARD, who did unlawfully kill JANE DOE #1, a human being, without malice aforethought, in the driving of a vehicle in violation of Vehicle Code Sections 23140, 23152 and 23153 and the killing was proximate result of the commission of an unlawful act, not amounting to a felony and with gross negligence and/or proximate result of the commission of a lawful act which might produce death, in an unlawful manner, and with gross negligence and/or proximate result of the commission of an unlawful act, not amounting to a felony, and with gross negligence and the proximate result of the commission of lawful act which might produce death, in an unlawful manner, and with gross negligence.

It is further alleged that the above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) (8).

**SPEC ALLEG-BODILY INJURY TO MORE THAN ONE VICTIM**

It is further alleged that the defendant proximately caused death or bodily injury to more than one victim, to wit: JANE DOE #2, within the meaning of **Vehicle Code Section 23558**.

"NOTICE: Pursuant to CVC Section 23195 you are notified that the District Attorney will request impoundment of your vehicle, at your expense, in the event of a conviction of this offense."

**SPEC ALLEG-BODILY INJURY TO MORE THAN ONE VICTIM**

It is further alleged that the defendant proximately caused death or bodily injury to more than one victim, to wit: JANE DOE #3, within the meaning of **Vehicle Code Section 23558**.

"NOTICE: Pursuant to CVC Section 23195 you are notified that the District Attorney will request impoundment of your vehicle, at your expense, in the event of a conviction of this offense."

**SPEC ALLEG-BODILY INJURY TO MORE THAN ONE VICTIM**

It is further alleged that the defendant proximately caused death or bodily injury to more than one victim, to wit: D. MURRIETA , within the meaning of **Vehicle Code Section 23558**.

"NOTICE: Pursuant to CVC Section 23195 you are notified that the District Attorney will request impoundment of your vehicle, at your expense, in the event of a conviction of this offense."

**SPEC ALLEG – SERIOUS/VIOLENT/REGISTERABLE SEX OFFENSE FELONY**

It is further alleged that Count 1 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.”

**COUNT 2**

On or about June 26, 2017, in the County of Santa Barbara, the crime of GROSS VEHICULAR MANSLAUGHTER WHILE INTOXICATED, in violation of **PENAL CODE SECTION 191.5(a)**, a Felony, was committed by BRANDON SCOTT WOODWARD, who did unlawfully kill JANE DOE #2, a human being, without malice aforethought, in the driving of a vehicle in violation of Vehicle Code Sections 23140, 23152 and 23153 and the killing was proximate result of the commission of an unlawful act, not amounting to a felony and with gross negligence and/or proximate result of the commission of a lawful act which might produce death, in an unlawful manner, and with gross negligence and/or proximate result of the commission of an unlawful act, not amounting to a felony, and with gross negligence and the proximate result of the commission of lawful act which might produce death, in an unlawful manner, and with gross negligence.

It is further alleged that the above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) (8).

**SPEC ALLEG-BODILY INJURY TO MORE THAN ONE VICTIM**

It is further alleged that the defendant proximately caused death or bodily injury to more than one victim, to wit: JANE DOE #1, within the meaning of **Vehicle Code Section 23558**.

"NOTICE: Pursuant to CVC Section 23195 you are notified that the District Attorney will request impoundment of your vehicle, at your expense, in the event of a conviction of this offense."

### **SPEC ALLEG-BODILY INJURY TO MORE THAN ONE VICTIM**

It is further alleged that the defendant proximately caused death or bodily injury to more than one victim, to wit: JANE DOE #3, within the meaning of **Vehicle Code Section 23558**.

"NOTICE: Pursuant to CVC Section 23195 you are notified that the District Attorney will request impoundment of your vehicle, at your expense, in the event of a conviction of this offense."

### **SPEC ALLEG-BODILY INJURY TO MORE THAN ONE VICTIM**

It is further alleged that the defendant proximately caused death or bodily injury to more than one victim, to wit: D. MURRIETA, within the meaning of **Vehicle Code Section 23558**.

"NOTICE: Pursuant to CVC Section 23195 you are notified that the District Attorney will request impoundment of your vehicle, at your expense, in the event of a conviction of this offense."

### **SPEC ALLEG – SERIOUS/VIOLENT/REGISTERABLE SEX OFFENSE FELONY**

It is further alleged as to Count 2 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."

### **COUNT 3**

On or about June 26, 2017, in the County of Santa Barbara, the crime of **DRIVING UNDER THE INFLUENCE OF ALCOHOL CAUSING INJURY**, in violation of **VEHICLE CODE SECTION 23153(a)**, a Felony, was committed by BRANDON SCOTT WOODWARD, who did unlawfully, while under the influence of an alcoholic beverage drive a vehicle and in so driving, concurrently did an act forbidden by law and neglected a duty imposed by law, to wit: a violation of **Vehicle Code Section 23103 or 23123.5 or 22350** which proximately caused bodily injury to JANE DOE #3.

"NOTICE: If convicted of this offense the court must suspend your driving privileges if you are under the age of 21 years. Vehicle Code Section 13202.5".

### **SPECIAL ALLEG - GREAT BODILY INJURY**

It is further alleged that in the commission of the above offense the said defendant, BRANDON SCOTT WOODWARD, personally inflicted great bodily injury on JANE DOE #1, not an accomplice to the above offense, within the meaning of **Penal Code Section 12022.7(a)** and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8).

It is further alleged that the above offense is a violent felony within the meaning of **Penal Code Section 667.5(c)(8)**.

**SPECIAL ALLEG - GREAT BODILY INJURY**

It is further alleged that in the commission of the above offense the said defendant, BRANDON SCOTT WOODWARD, personally inflicted great bodily injury on JANE DOE #2, not an accomplice to the above offense, within the meaning of **Penal Code Section 12022.7(a)** and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8).

It is further alleged that the above offense is a violent felony within the meaning of **Penal Code Section 667.5(c)(8)**.

**SPECIAL ALLEG - GREAT BODILY INJURY**

It is further alleged that in the commission of the above offense the said defendant, BRANDON SCOTT WOODWARD, personally inflicted great bodily injury on JANE DOE #3, not an accomplice to the above offense, within the meaning of **Penal Code Section 12022.7(a)** and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8).

It is further alleged that the above offense is a violent felony within the meaning of **Penal Code Section 667.5(c)(8)**.

**SPEC ALLEG-BODILY INJURY TO MORE THAN ONE VICTIM**

It is further alleged that the defendant proximately caused death or bodily injury to more than one victim, to wit: JANE DOE #1, within the meaning of **Vehicle Code Section 23558**.

"NOTICE: Pursuant to CVC Section 23195 you are notified that the District Attorney will request impoundment of your vehicle, at your expense, in the event of a conviction of this offense."

**SPEC ALLEG-BODILY INJURY TO MORE THAN ONE VICTIM**

It is further alleged that the defendant proximately caused death or bodily injury to more than one victim, to wit: JANE DOE #2, within the meaning of **Vehicle Code Section 23558**.

"NOTICE: Pursuant to CVC Section 23195 you are notified that the District Attorney will request impoundment of your vehicle, at your expense, in the event of a conviction of this offense."

**SPEC ALLEG-BODILY INJURY TO MORE THAN ONE VICTIM**

It is further alleged that the defendant proximately caused death or bodily injury to more than one victim, to wit: D.MURRIETA, within the meaning of **Vehicle Code Section 23558**.

"NOTICE: Pursuant to CVC Section 23195 you are notified that the District Attorney will request impoundment of your vehicle, at your expense, in the event of a conviction of this offense."

**SPEC ALLEG – SERIOUS/VIOLENT/REGISTERABLE SEX OFFENSE FELONY**

It is further alleged as to Count 3 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.”

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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 3 COUNT(S).

Executed at Santa Barbara, California, on August 18, 2017.



KEVIN WEICHBROD  
DEPUTY DISTRICT ATTORNEY

Agency: CHP

<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>
Brandon Scott Woodward	M	W	602	210	BLU	BRO	F71227493	BR	08/22/2017

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