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County of San Mateo, State of California
2 State Bar No. 78470
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Attorney for Plaintiff
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7
8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF SAN MATEO

10 THE PEOPLE OF THE STATE OF CALIFORNIA
11
12 Plaintiff,

REPORT NO. SO2300605 &
SO2300617

DA CASE NO. 0877541

13 vs.

FELONY COMPLAINT

14 CHUNLI ZHAO
12761 SAN MATEO RD
15 HALF MOON BAY, CA 94019

16 Defendant.
17

18
19 I, the undersigned, say, on information and belief, that in the County of San Mateo, State of
20 California:

21 **COUNT 1: PC187(a) (Felony)**

22 On or about January 23, 2023, in the County of San Mateo, State of California, the crime of
23 Murder in violation of PC187(a), a Felony, was committed in that CHUNLI ZHAO did unlawfully,
24 and with malice aforethought murder Qi Zhong Cheng, a human being.
25

1 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
2 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)

3
4 **ENHANCEMENT 1**

5 **PC12022.53(d): Special Allegation-Personal And Intentional Discharge Of A Firearm Causing**
6 **Death**

7 It is further alleged as to Count 1 that said defendant, CHUNLI ZHAO personally and
8 intentionally discharged a firearm, a handgun, which caused death to Qi Zhong Cheng within the
9 meaning of Penal Code Section 12022.53(d) also causing the above offense to become a serious
10 felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal
11 Code section 667.5(c)(8).

12
13 **ENHANCEMENT 2**

14 **PC1203.075(a): Special Allegation-Great Bodily Injury**

15 It is further alleged as to Count 1 that in the commission of the above offense the said
16 defendant, CHUNLI ZHAO personally inflicted great bodily injury upon Qi Zhong Cheng, not an
17 accomplice to the above offense, within the meaning of Penal Code Sections 1203.075(a) and
18 12022.7.

19
20 **COUNT 2: PC187(a) (Felony)**

21 On or about January 23, 2023, in the County of San Mateo, State of California, the crime of
22 Murder in violation of PC187(a), a Felony, was committed in that CHUNLI ZHAO did unlawfully,
23 and with malice aforethought murder Ye Tao Bing, a human being.

1 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
2 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)

3
4 **ENHANCEMENT 1**

5 **PC12022.53(d): Special Allegation-Personal And Intentional Discharge Of A Firearm Causing**
6 **Death**

7 It is further alleged as to Count 2 that said defendant, CHUNLI ZHAO personally and
8 intentionally discharged a firearm, a handgun, which caused death to Ye Tao Bing within the
9 meaning of Penal Code Section 12022.53(d) also causing the above offense to become a serious
10 felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal
11 Code section 667.5(c)(8).

12
13 **ENHANCEMENT 2**

14 **PC1203.075(a): Special Allegation-Great Bodily Injury**

15 It is further alleged as to Count 2 that in the commission of the above offense the said
16 defendant, CHUNLI ZHAO personally inflicted great bodily injury upon Ye Tao Bing, not an
17 accomplice to the above offense, within the meaning of Penal Code Sections 1203.075(a) and
18 12022.7.

19
20 **COUNT 3: PC187(a) (Felony)**

21 On or about January 23, 2023, in the County of San Mateo, State of California, the crime of
22 Murder in violation of PC187(a), a Felony, was committed in that CHUNLI ZHAO did unlawfully,
23 and with malice aforethought murder Jing Zhi Lu, a human being.

1 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
2 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)

3
4 **ENHANCEMENT 1**

5 **PC12022.53(d): Special Allegation-Personal And Intentional Discharge Of A Firearm Causing**
6 **Death**

7 It is further alleged as to Count 3 that said defendant, CHUNLI ZHAO personally and
8 intentionally discharged a firearm, a handgun, which caused death to Jing Zhi Lu within the meaning
9 of Penal Code Section 12022.53(d) also causing the above offense to become a serious felony
10 pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code
11 section 667.5(c)(8).

12
13 **ENHANCEMENT 2**

14 **PC1203.075(a): Special Allegation-Great Bodily Injury**

15 It is further alleged as to Count 2 that in the commission of the above offense the said
16 defendant, CHUNLI ZHAO personally inflicted great bodily injury upon Jing Zhi Lu, not an
17 accomplice to the above offense, within the meaning of Penal Code Sections 1203.075(a) and
18 12022.7.

19
20 **COUNT 4: PC187(a) (Felony)**

21 On or about January 23, 2023, in the County of San Mateo, State of California, the crime of
22 Murder in violation of PC187(a), a Felony, was committed in that CHUNLI ZHAO did unlawfully,
23 and with malice aforethought murder Jose Romero Perez, a human being.

1 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
2 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)
3

4 **ENHANCEMENT 1**

5 **PC12022.53(d): Special Allegation-Personal And Intentional Discharge Of A Firearm Causing**
6 **Death**

7 It is further alleged as to Count 4 that said defendant, CHUNLI ZHAO personally and
8 intentionally discharged a firearm, a handgun, which caused death to Jose Romero Perez within the
9 meaning of Penal Code Section 12022.53(d) also causing the above offense to become a serious
10 felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal
11 Code section 667.5(c)(8).
12

13 **ENHANCEMENT 2**

14 **PC1203.075(a): Special Allegation-Great Bodily Injury**

15 It is further alleged as to Count 4 that in the commission of the above offense the said
16 defendant, CHUNLI ZHAO personally inflicted great bodily injury upon Jose Romero Perez, not an
17 accomplice to the above offense, within the meaning of Penal Code Sections 1203.075(a) and
18 12022.7.
19

20 **COUNT 5: PC664/PC187(a) (Felony)**

21 On or about January 23, 2023, in the County of San Mateo, State of California, the crime of
22 Attempted Willful, Deliberate, And Premeditated Murder in violation of PC664/PC187(a), a Felony,
23 was committed in that CHUNLI ZHAO did unlawfully and with malice aforethought attempt to
24 murder Pedro Romero Perez, a human being.
25

1 It is further alleged that the aforesaid attempted murder was committed willfully, deliberately and
2 with premeditation within the meaning of Penal Code section 189.

3 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
4 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c).

5
6 **ENHANCEMENT 1**

7 **PC12022.53(d): Special Allegation-Personal And Intentional Discharge Of A Firearm Causing**
8 **Great Bodily Injury**

9 It is further alleged as to Count 5 that said defendant, CHUNLI ZHAO personally and
10 intentionally discharged a firearm, a handgun, which caused great bodily injury to Pedro Romero
11 Perez within the meaning of Penal Code Section 12022.53(d) also causing the above offense to
12 become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the
13 meaning of Penal Code section 667.5(c)(8).

14
15 **COUNT 6: PC187(a) (Felony)**

16 On or about January 23, 2023, in the County of San Mateo, State of California, the crime of
17 Murder in violation of PC187(a), a Felony, was committed in that CHUNLI ZHAO did unlawfully,
18 and with malice aforethought murder Marciano Jimenez Martinez, a human being.

19 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
20 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)

1 **ENHANCEMENT 1**

2 **PC12022.53(d): Special Allegation-Personal And Intentional Discharge Of A Firearm Causing**
3 **Death**

4 It is further alleged as to Count 6 that said defendant, CHUNLI ZHAO personally and
5 intentionally discharged a firearm, a handgun, which caused death to Marciano Jimenez Martinez
6 within the meaning of Penal Code Section 12022.53(d) also causing the above offense to become a
7 serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning
8 of Penal Code section 667.5(c)(8).

9
10 **ENHANCEMENT 2**

11 **PC1203.075(a): Special Allegation-Great Bodily Injury**

12 It is further alleged as to Count 6 that in the commission of the above offense the said
13 defendant, CHUNLI ZHAO personally inflicted great bodily injury upon Marciano Jimenez
14 Martinez, not an accomplice to the above offense, within the meaning of Penal Code Sections
15 1203.075(a) and 12022.7.

16
17 **COUNT 7: PC187(a) (Felony)**

18 On or about January 23, 2023, in the County of San Mateo, State of California, the crime of
19 Murder in violation of PC187(a), a Felony, was committed in that CHUNLI ZHAO did unlawfully,
20 and with malice aforethought murder Zhi Shen Liu, a human being.

21 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
22 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)

1 **ENHANCEMENT 1**

2 **PC12022.53(d): Special Allegation-Personal And Intentional Discharge Of A Firearm Causing**
3 **Death**

4 It is further alleged as to Count 7 that said defendant, CHUNLI ZHAO personally and
5 intentionally discharged a firearm, a handgun, which caused death to Zhi Shen Liu within the
6 meaning of Penal Code Section 12022.53(d) also causing the above offense to become a serious
7 felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal
8 Code section 667.5(c)(8).

9
10 **ENHANCEMENT 2**

11 **PC1203.075(a): Special Allegation-Great Bodily Injury**

12 It is further alleged as to Count 7 that in the commission of the above offense the said
13 defendant, CHUNLI ZHAO personally inflicted great bodily injury upon Zhi Shen Liu, not an
14 accomplice to the above offense, within the meaning of Penal Code Sections 1203.075(a) and
15 12022.7.

16
17 **COUNT 8: PC187(a) (Felony)**

18 On or about January 23, 2023 at 4:41 PM, in the County of San Mateo, State of California, the
19 crime of Murder in violation of PC187(a), a Felony, was committed in that CHUNLI ZHAO did
20 unlawfully, and with malice aforethought murder Ai Xiang Zhang, a human being.

21 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
22 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)

1 **ENHANCEMENT 1**

2 **PC12022.53(d): Special Allegation-Personal And Intentional Discharge Of A Firearm Causing**
3 **Death**

4 It is further alleged as to Count 8 that said defendant, CHUNLI ZHAO personally and
5 intentionally discharged a firearm, a handgun, which caused death to Ai Xiang Zhang within the
6 meaning of Penal Code Section 12022.53(d) also causing the above offense to become a serious
7 felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal
8 Code section 667.5(c)(8).

9
10 **ENHANCEMENT 2**

11 **PC1203.075(a): Special Allegation-Great Bodily Injury**

12 It is further alleged as to Count 8 that in the commission of the above offense the said
13 defendant, CHUNLI ZHAO personally inflicted great bodily injury upon Ai Xiang Zhang, not an
14 accomplice to the above offense, within the meaning of Penal Code Sections 1203.075(a) and
15 12022.7.

16
17 **ENHANCEMENT 3**

18 **PC190.2(a)(3): Special Circumstance-Multiple Murder**

19 It is further alleged as to Count 1, Count 2, Count 3, Count 4, Count 6, Count 7 and Count
20 8 that the offenses charged in each of those counts are a special circumstance within the meaning of
21 Penal Code Section 190.2(a)(3) (Multiple Murder).

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

1 Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that
2 defendant(s) and his or her attorney provide to the People the discovery required by Penal Code
3 Section 1054.3. This is a continuing request pursuant to the provisions of Penal Code Section 1054.7.

4 I declare under penalty of perjury that the foregoing is true and correct except for those things
5 stated on information and belief and those I believe to be true.

6 Executed on January 25, 2023, at San Mateo County, California.

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COMPLAINANT

10 SMW/jks
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