CARLA RODRIGUEZ, #183874
District Attorney, County of Sonoma
Scott K Uemura, #280412
Deputy District Attorney
600 Administration Dr Rm 212-J
Santa Rosa, CA 95403
Telephone: (707) 565-2311
Email: districtattorney@sonoma-county.org

Attorney for the People

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SONOMA

THE PEOPLE OF THE STATE OF CALIFORNIA Plaintiff, vs. ADAM VINCENT MARLOWE ID NO. 687173 AKA ADAM MARLOWE Defendant.	COURT CASE NO. FELONY COMPLAINT Section(s) PC30605(a), PC30600(a) DA CASE NO. 1025047 Appearance Date: March 21, 2023

The District Attorney of the County of Sonoma, State of California, hereby accuses the above named defendant of the following criminal offenses:

Count 1

On or about January 14, 2023, in the County of Sonoma, State of California, the crime of Possession Of An Assault Weapon in violation of PC30605(a), a **Felony**, was committed in that ADAM VINCENT MARLOWE did unlawfully possess an assault weapon, to wit: assault pistol.

Count 2

On or about January 14, 2023, in the County of Sonoma, State of California, the crime of Unlawful Assault Weapon/.50 Bmg Rifle Activity in violation of PC30600(a), a **Felony**, was committed in that ADAM VINCENT MARLOWE did unlawfully manufacture, caused to the manufactured, distribute, transport, import into this State, keep for sale, offer and expose for sale, give and lend an assault weapon and a .50 BMG rifle, to wit: assault pistol.

NOTICE: Conviction for these offenses may require you to provide specimens and samples pursuant to Penal Code Section 296 if you are convicted of a felony offense or have a prior qualifying offense in your criminal background. Willful refusal to provide the specimens and samples is a crime.

NOTICE: PURSUANT TO PENAL CODE SECTION 29810(a)(1)

NOTICE: Conviction of this offense will require you to relinquish all firearms you own, possess, or have under your custody or control in the manner provided in Penal Code section 29810.

NOTICE: PURSUANT TO PENAL CODE SECTION 29810(a)(2)

NOTICE: Conviction of this offense will prohibit you from owning, purchasing, receiving, possessing, or having under your custody or control any firearms, ammunition, and ammunition feeding devices, including but not limited to magazines.

MARSY'S LAW

Information contained in the reports being distributed as discovery in this case may contain confidential information protected by Marsy's Law and the amendments to the State of California Constitution Section 28. Any victim(s) in any above referenced charge(s) is entitled to be safe and free from intimidation, harassment, and abuse. The defendant(s), defense counsel, and any other person acting on behalf of the defendant(s) is admonished not to use any information contained in

the reports to locate or harass any victim or the victim(s)s' family and to not disclose any information that is otherwise privileged and confidential by law. Additionally, it is a violation of Penal Code Section 1054.2(a)(3) to disclose the address and telephone number of a victim or witness to a defendant, defendant's family member, or anyone else. Note exceptions provided in Penal Code Section 1054.2(a)(1) and (2).

Discovery Request: 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.

Complainant therefore prays that a warrant issue and that said defendant be dealt with according to law. I declare under penalty of perjury under the laws of the State of California, based on information and belief, that the foregoing is true and correct.

FACTORS IN AGGRAVATION

It is further alleged as to the above offenses, enhancements and special allegations, the following sentencing factors in aggravation relating to the crime and relating to the defendant apply:

(a) Factors relating to the crime

(1) The crime involved great violence, great bodily harm, threat of great bodily harm, or other acts disclosing a high degree of cruelty, viciousness, or callousness.

(2) The defendant was armed with or used a weapon at the time of the commission of the crime.

(3) The victim was particularly vulnerable.

(4) The defendant induced others to participate in the commission of the crime or occupied a position of leadership or dominance of other participants in its commission.

(5) The defendant induced a minor to commit or assist in the commission of the crime.

(6) The defendant threatened witnesses, unlawfully prevented or dissuaded witnesses from testifying, suborned perjury, or in any other way illegally interfered with the judicial process.

(7) The defendant was convicted of other crimes for which consecutive sentences could have been imposed but for which concurrent sentences are being imposed.

(8) The manner in which the crime was carried out indicates planning, sophistication, or professionalism.

(9) The crime involved an attempted or actual taking or damage of great monetary value.

(10) The crime involved a large quantity of contraband.

(11) The defendant took advantage of a position of trust or confidence to commit the offense.

(12) The crime constitutes a hate crime under section 422.55 and:

(A) No hate crime enhancements under section 422.75 are imposed; and

(B) The crime is not subject to sentencing under section 1170.8.

(b) Factors relating to the defendant

(1) The defendant has engaged in violent conduct that indicates a serious danger to society.

(2) The defendant's prior convictions as an adult or sustained petitions in juvenile delinquency proceedings are numerous or of increasing seriousness.

(3) The defendant has served a prior term in prison or county jail under section 1170(h).

(4) The defendant was on probation, mandatory supervision, postrelease community supervision, or parole when the crime was committed.

(5) The defendant's prior performance on probation, mandatory supervision, postrelease community supervision, or parole was unsatisfactory.

Dated: March 20, 2023

CARLA RODRIGUEZ
DISTRICT ATTORNEY

By: 

Scott K Uemura
Deputy District Attorney