

IN CUSTODY

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO  
SOUTH COUNTY DIVISION**

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,  
  
v.  
  
JACQUELINE MA,  
*dob 02/10/89, Booking No. 23709558A;*  
  
Defendant

CT No. CS325550  
DA No. BCK855  
AMENDED  
COMPLAINT-FELONY

INFORMATION  
  
Date: \_\_\_\_\_

**PC296 DNA TEST STATUS SUMMARY**

**Defendant**

**DNA Testing Requirements**

MA, JACQUELINE

DNA sample has been previously provided

**CHARGE SUMMARY**

| Count | Charge                        | Issue Type | Sentence Range | Special Allegations                   | Allegation Effect           |
|-------|-------------------------------|------------|----------------|---------------------------------------|-----------------------------|
| 1     | PC288(b)(1)<br>MA, JACQUELINE | Felony     | 5-8-10         | PC1203.066(a)(8)<br>PC667.61(b)(c)(e) | No Probation<br>15 Yrs-Life |
| 2     | PC288(a)<br>MA, JACQUELINE    | Felony     | 3-6-8          | PC1203.066(a)(8)<br>PC667.61(b)(c)(e) | No Probation<br>15 Yrs-Life |
| 3     | PC288(a)<br>MA, JACQUELINE    | Felony     | 3-6-8          | PC1203.066(a)(8)<br>PC667.61(b)(c)(e) | No Probation<br>15 Yrs-Life |
| 4     | PC288(a)<br>MA, JACQUELINE    | Felony     | 3-6-8          | PC1203.066(a)(8)<br>PC667.61(b)(c)(e) | No Probation<br>15 Yrs-Life |

## CHARGE SUMMARY (cont'd)

| Count | Charge                           | Issue Type | Sentence Range | Special Allegations                   | Allegation Effect           |
|-------|----------------------------------|------------|----------------|---------------------------------------|-----------------------------|
| 5     | PC288(a)<br>MA, JACQUELINE       | Felony     | 3-6-8          | PC1203.066(a)(8)<br>PC667.61(b)(c)(e) | No Probation<br>15 Yrs-Life |
| 6     | PC288(a)<br>MA, JACQUELINE       | Felony     | 3-6-8          | PC1203.066(a)(8)<br>PC667.61(b)(c)(e) | No Probation<br>15 Yrs-Life |
| 7     | PC288(a)<br>MA, JACQUELINE       | Felony     | 3-6-8          | PC1203.066(a)(8)<br>PC667.61(b)(c)(e) | No Probation<br>15 Yrs-Life |
| 8     | PC288(a)<br>MA, JACQUELINE       | Felony     | 3-6-8          | PC1203.066(a)(8)<br>PC667.61(b)(c)(e) | No Probation<br>15 Yrs-Life |
| 9     | PC288(a)<br>MA, JACQUELINE       | Felony     | 3-6-8          | PC1203.066(a)(8)<br>PC667.61(b)(c)(e) | No Probation<br>15 Yrs-Life |
| 10    | PC288(a)<br>MA, JACQUELINE       | Felony     | 3-6-8          | PC1203.066(a)(8)<br>PC667.61(b)(c)(e) | No Probation<br>15 Yrs-Life |
| 11    | PC664\PC288(a)<br>MA, JACQUELINE | Felony     |                |                                       |                             |
| 12    | PC288.3(a)<br>MA, JACQUELINE     | Felony     | Check Code     |                                       |                             |
| 13    | PC288.3(a)<br>MA, JACQUELINE     | Felony     | Check Code     |                                       |                             |
| 14    | PC311.4(c)<br>MA, JACQUELINE     | Felony     | 16-2-3         |                                       |                             |
| 15    | PC311.4(c)<br>MA, JACQUELINE     | Felony     | 16-2-3         |                                       |                             |
| 16    | PC311.11(a)<br>MA, JACQUELINE    | Felony     | 16-2-3         |                                       |                             |
| 17    | PC288.2(a)<br>MA, JACQUELINE     | Felony     | 16-2-3         |                                       |                             |
| 18    | PC288.2(a)<br>MA, JACQUELINE     | Felony     | 16-2-3         |                                       |                             |

## CHARGE SUMMARY (cont'd)

| Count | Charge                       | Issue Type | Sentence Range | Special Allegations            | Allegation Effect |
|-------|------------------------------|------------|----------------|--------------------------------|-------------------|
| 19    | PC288.2(a)<br>MA, JACQUELINE | Felony     | 16-2-3         |                                |                   |
|       | PC1054.3                     |            |                | INFORMAL REQUEST FOR DISCOVERY |                   |

The undersigned, certifying upon information and belief, complains that in the County of San Diego, State of California, the Defendant(s) did commit the following crime(s):

### CHARGES

#### COUNT 1 - FORCIBLE LEWD ACT UPON CHILD

On or about and between December 30, 2022 and March 1, 2023, JACQUELINE MA did willfully, unlawfully and lewdly commit a lewd and lascivious act upon and with the body and parts and members thereof of John Doe 1, a child under the age of fourteen years, with the intent of arousing, appealing to and gratifying the lust, passions and sexual desires of the said defendant and the victim and did commit said act by use of force, violence, duress, menace and fear of immediate and unlawful bodily injury on the victim and another person, (to wit: hand on penis) in violation of PENAL CODE SECTION 288(b)(1).

And it is further alleged JACQUELINE MA did have substantial sexual conduct with John Doe 1, a child under fourteen years of age, in the commission of the above described felony of Lewd Acts On A Child, within the meaning of PENAL CODE SECTION 1203.066(a)(8).

And it is further alleged that said defendant, JACQUELINE MA, has been convicted in the present case and cases of committing an offense specified in subdivision (c) against more than one victim, within the meaning of PENAL CODE SECTION 667.61(b)(c)(e).

#### COUNT 2 - LEWD ACT UPON A CHILD

On or about and between December 30, 2022 and March 1, 2023, JACQUELINE MA did willfully and lewdly commit a lewd and lascivious act upon and with the body and any part and member thereof of John Doe 1, a child under the age of fourteen years, with the intent of arousing, appealing to and gratifying the lust, passions and sexual desires of the said defendant and the said child (to wit: penis on vagina, first time), in violation of PENAL CODE SECTION 288(a).

And it is further alleged JACQUELINE MA did have substantial sexual conduct with John Doe 1, a child under fourteen years of age, in the commission of the above described felony of Lewd Acts On A Child, within the meaning of PENAL CODE SECTION 1203.066(a)(8).

## **CHARGES (cont'd)**

And it is further alleged that said defendant, JACQUELINE MA, has been convicted in the present case and cases of committing an offense specified in subdivision (c) against more than one victim, within the meaning of PENAL CODE SECTION 667.61(b)(c)(e).

### **COUNT 3 - LEWD ACT UPON A CHILD**

On or about and between December 30, 2022 and March 1, 2023, JACQUELINE MA did willfully and lewdly commit a lewd and lascivious act upon and with the body and any part and member thereof of John Doe 1, a child under the age of fourteen years, with the intent of arousing, appealing to and gratifying the lust, passions and sexual desires of the said defendant and the said child (to wit: penis on vagina, last time), in violation of PENAL CODE SECTION 288(a).

And it is further alleged JACQUELINE MA did have substantial sexual conduct with John Doe 1, a child under fourteen years of age, in the commission of the above described felony of Lewd Acts On A Child, within the meaning of PENAL CODE SECTION 1203.066(a)(8).

And it is further alleged that said defendant, JACQUELINE MA, has been convicted in the present case and cases of committing an offense specified in subdivision (c) against more than one victim, within the meaning of PENAL CODE SECTION 667.61(b)(c)(e).

### **COUNT 4 - LEWD ACT UPON A CHILD**

On or about and between December 30, 2022 and March 1, 2023, JACQUELINE MA did willfully and lewdly commit a lewd and lascivious act upon and with the body and any part and member thereof of John Doe 1, a child under the age of fourteen years, with the intent of arousing, appealing to and gratifying the lust, passions and sexual desires of the said defendant and the said child (to wit: mouth on penis, first time), in violation of PENAL CODE SECTION 288(a).

And it is further alleged JACQUELINE MA did have substantial sexual conduct with John Doe 1, a child under fourteen years of age, in the commission of the above described felony of Lewd Acts On A Child, within the meaning of PENAL CODE SECTION 1203.066(a)(8).

And it is further alleged that said defendant, JACQUELINE MA, has been convicted in the present case and cases of committing an offense specified in subdivision (c) against more than one victim, within the meaning of PENAL CODE SECTION 667.61(b)(c)(e).

## **CHARGES (cont'd)**

### **COUNT 5 - LEWD ACT UPON A CHILD**

On or about and between December 30, 2022 and March 1, 2023, JACQUELINE MA did willfully and lewdly commit a lewd and lascivious act upon and with the body and any part and member thereof of John Doe 1, a child under the age of fourteen years, with the intent of arousing, appealing to and gratifying the lust, passions and sexual desires of the said defendant and the said child (to wit: mouth on penis, last time), in violation of PENAL CODE SECTION 288(a).

And it is further alleged JACQUELINE MA did have substantial sexual conduct with John Doe 1, a child under fourteen years of age, in the commission of the above described felony of Lewd Acts On A Child, within the meaning of PENAL CODE SECTION 1203.066(a)(8).

And it is further alleged that said defendant, JACQUELINE MA, has been convicted in the present case and cases of committing an offense specified in subdivision (c) against more than one victim, within the meaning of PENAL CODE SECTION 667.61(b)(c)(e).

### **COUNT 6 - LEWD ACT UPON A CHILD**

On or about and between December 30, 2022 and March 1, 2023, JACQUELINE MA did willfully and lewdly commit a lewd and lascivious act upon and with the body and any part and member thereof of John Doe 1, a child under the age of fourteen years, with the intent of arousing, appealing to and gratifying the lust, passions and sexual desires of the said defendant and the said child (to wit: finger on vagina, first time), in violation of PENAL CODE SECTION 288(a).

And it is further alleged JACQUELINE MA did have substantial sexual conduct with John Doe 1, a child under fourteen years of age, in the commission of the above described felony of Lewd Acts On A Child, within the meaning of PENAL CODE SECTION 1203.066(a)(8).

And it is further alleged that said defendant, JACQUELINE MA, has been convicted in the present case and cases of committing an offense specified in subdivision (c) against more than one victim, within the meaning of PENAL CODE SECTION 667.61(b)(c)(e).

### **COUNT 7 - LEWD ACT UPON A CHILD**

On or about and between December 30, 2022 and March 1, 2023, JACQUELINE MA did willfully and lewdly commit a lewd and lascivious act upon and with the body and any part and member thereof of John Doe 1, a child under the age of fourteen years, with the intent of arousing, appealing to and gratifying the lust, passions and sexual desires of the said defendant and the said child (to wit: finger on vagina, last time), in violation of PENAL CODE SECTION 288(a).

And it is further alleged JACQUELINE MA did have substantial sexual conduct with John Doe 1, a child under fourteen years of age, in the commission of the above described felony of Lewd Acts On A Child, within the meaning of PENAL CODE SECTION 1203.066(a)(8).

## **CHARGES (cont'd)**

And it is further alleged that said defendant, JACQUELINE MA, has been convicted in the present case and cases of committing an offense specified in subdivision (c) against more than one victim, within the meaning of PENAL CODE SECTION 667.61(b)(c)(e).

### **COUNT 8 - LEWD ACT UPON A CHILD**

On or about and between December 30, 2020 and March 7, 2023, JACQUELINE MA did willfully and lewdly commit a lewd and lascivious act upon and with the body and any part and member thereof of John Doe 1, a child under the age of fourteen years, with the intent of arousing, appealing to and gratifying the lust, passions and sexual desires of the said defendant and the said child (to wit: caused John Doe 1 to touch his own penis, first time), in violation of PENAL CODE SECTION 288(a).

And it is further alleged JACQUELINE MA did have substantial sexual conduct with John Doe 1, a child under fourteen years of age, in the commission of the above described felony of Lewd Acts On A Child, within the meaning of PENAL CODE SECTION 1203.066(a)(8).

And it is further alleged that said defendant, JACQUELINE MA, has been convicted in the present case and cases of committing an offense specified in subdivision (c) against more than one victim, within the meaning of PENAL CODE SECTION 667.61(b)(c)(e).

### **COUNT 9 - LEWD ACT UPON A CHILD**

On or about and between December 30, 2020 and March 7, 2023, JACQUELINE MA did willfully and lewdly commit a lewd and lascivious act upon and with the body and any part and member thereof of John Doe 1, a child under the age of fourteen years, with the intent of arousing, appealing to and gratifying the lust, passions and sexual desires of the said defendant and the said child (to wit: caused John Doe 1 to touch his own penis, last time), in violation of PENAL CODE SECTION 288(a).

And it is further alleged JACQUELINE MA did have substantial sexual conduct with John Doe 1, a child under fourteen years of age, in the commission of the above described felony of Lewd Acts On A Child, within the meaning of PENAL CODE SECTION 1203.066(a)(8).

And it is further alleged that said defendant, JACQUELINE MA, has been convicted in the present case and cases of committing an offense specified in subdivision (c) against more than one victim, within the meaning of PENAL CODE SECTION 667.61(b)(c)(e).

### **COUNT 10 - LEWD ACT UPON A CHILD**

On or about February 23, 2020, JACQUELINE MA did willfully and lewdly commit a lewd and lascivious act upon and with the body and any part and member thereof of John Doe 2, a child under the age of fourteen years, with the intent of arousing, appealing to and gratifying the lust, passions and sexual desires of the said defendant and the said child (to wit: caused John Doe 2 to touch his own penis), in violation of PENAL CODE SECTION 288(a).

## **CHARGES (cont'd)**

And it is further alleged JACQUELINE MA did have substantial sexual conduct with John Doe 2, a child under fourteen years of age, in the commission of the above described felony of Lewd Acts On A Child, within the meaning of PENAL CODE SECTION 1203.066(a)(8).

And it is further alleged that said defendant, JACQUELINE MA, has been convicted in the present case and cases of committing an offense specified in subdivision (c) against more than one victim, within the meaning of PENAL CODE SECTION 667.61(b)(c)(e).

### **COUNT 11 - ATTEMPT LEWD ACT UPON A CHILD**

On or about February 24, 2020, JACQUELINE MA did willfully and lewdly attempt to commit a lewd and lascivious act upon and with the body and any part and member thereof of John Doe 2, a child under the age of fourteen years, with the intent of arousing, appealing to and gratifying the lust, passions and sexual desires of the said defendant and the said child (to wit: shirt off in classroom), in violation of PENAL CODE SECTION 288(a) and PENAL CODE SECTION 664.

### **COUNT 12 - CONTACT OF MINOR WITH INTENT TO COMMIT A SEXUAL OFFENSE**

On or about and between December 30, 2022 and January 7, 2023, JACQUELINE MA did unlawfully contact and communicate with a minor and attempted to contact and communicate with a minor and knew and reasonably should have known that the person was a minor and with the intent to commit an offense specified in Penal Code section 288 involving the minor, in violation of PENAL CODE SECTION 288.3(a).

### **COUNT 13 - CONTACT OF MINOR WITH INTENT TO COMMIT A SEXUAL OFFENSE**

On or about January 30, 2023, JACQUELINE MA did unlawfully contact and communicate with a minor and attempted to contact and communicate with a minor and knew and reasonably should have known that the person was a minor and with the intent to commit an offense specified in Penal Code section 288 involving the minor, in violation of PENAL CODE SECTION 288.3(a).

## **CHARGES (cont'd)**

### **COUNT 14 - EMPLOYMENT OF MINOR TO PERFORM PROHIBITED ACTS**

On or about and between January 3, 2023 and March 6, 2023, JACQUELINE MA did unlawfully and knowingly promote, employ, use, persuade, induce, and coerce a minor under the age of 18 years, and being in possession of any facts on the basis of which he should reasonably know that John Doe 1 was a minor under the age of 18 years, and any parent and guardian of a minor under the age of 18 years under his control to knowingly permit the minor to engage in or assist others to engage in posing and modeling alone and with others for purposes of preparing a film, filmstrip, photograph, negative, slide, photocopy, videotape, video laser disc, computer hardware, computer software, computer floppy disc, data storage media, CD-ROM, computer-generated equipment or any other computer-generated image that contains or incorporates in any manner, any film, filmstrip, and live performance involving sexual conduct by a minor under the age of 18 years alone and with other persons and animals, in violation of PENAL CODE SECTION 311.4(c).

### **COUNT 15 - EMPLOYMENT OF MINOR TO PERFORM PROHIBITED ACTS**

On or about and between January 3, 2023 and March 3, 2023, JACQUELINE MA did unlawfully and knowingly promote, employ, use, persuade, induce, and coerce a minor under the age of 18 years, and being in possession of any facts on the basis of which he should reasonably know that John Doe 1 was a minor under the age of 18 years, and any parent and guardian of a minor under the age of 18 years under his control to knowingly permit the minor to engage in or assist others to engage in posing and modeling alone and with others for purposes of preparing a film, filmstrip, photograph, negative, slide, photocopy, videotape, video laser disc, computer hardware, computer software, computer floppy disc, data storage media, CD-ROM, computer-generated equipment or any other computer-generated image that contains or incorporates in any manner, any film, filmstrip, and live performance involving sexual conduct by a minor under the age of 18 years alone and with other persons and animals, in violation of PENAL CODE SECTION 311.4(c).

### **COUNT 16 - POSSESS MATTER DEPICTING PERSON UNDER 18 IN SEXUAL CONDUCT**

On or about March 7, 2023, JACQUELINE MA did unlawfully, knowing the matter depicts a person under the age of 18 years personally engaging in and simulating sexual conduct as defined in Penal Code section 311.4(d), knowingly possess and control the matter, production of which involved the use of a person under the age of 18 years, in violation of PENAL CODE SECTION 311.11(a).

### **COUNT 17 - HARMFUL MATTER SENT WITH INTENT OF SEDUCTION OF MINOR**

On or about and between January 1, 2023 and January 31, 2023, JACQUELINE MA did, knowing a person was a minor and failing to exercise reasonable care to ascertain the true age of said minor, knowingly and unlawfully distribute, send, cause to be sent, exhibit and offer to distribute and exhibit by any means, harmful matter as defined in Penal Code section 313 to a minor with the intent of arousing, appealing to and gratifying the lust, passions, and sexual desires of the defendant and of a minor, and with the intent and purpose of seducing the minor in violation of PENAL CODE SECTION 288.2(a).



## **CHARGES (cont'd)**

### **COUNT 18 - HARMFUL MATTER SENT WITH INTENT OF SEDUCTION OF MINOR**

On or about and between February 1, 2023 and February 28, 2023, JACQUELINE MA did, knowing a person was a minor and failing to exercise reasonable care to ascertain the true age of said minor, knowingly and unlawfully distribute, send, cause to be sent, exhibit and offer to distribute and exhibit by any means, harmful matter as defined in Penal Code section 313 to a minor with the intent of arousing, appealing to and gratifying the lust, passions, and sexual desires of the defendant and of a minor, and with the intent and purpose of seducing the minor in violation of PENAL CODE SECTION 288.2(a).

### **COUNT 19 - HARMFUL MATTER SENT WITH INTENT OF SEDUCTION OF MINOR**

On or about and between March 1, 2023 and March 2, 2023, JACQUELINE MA did, knowing a person was a minor and failing to exercise reasonable care to ascertain the true age of said minor, knowingly and unlawfully distribute, send, cause to be sent, exhibit and offer to distribute and exhibit by any means, harmful matter as defined in Penal Code section 313 to a minor with the intent of arousing, appealing to and gratifying the lust, passions, and sexual desires of the defendant and of a minor, and with the intent and purpose of seducing the minor in violation of PENAL CODE SECTION 288.2(a).



NOTICE: Any defendant named on this complaint who is on criminal probation in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's probation, on any and all such probation grants, utilizing the same evidence, at the preliminary hearing. Defenses to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

NOTICE: Any defendant named on this complaint who is on Mandatory Supervision in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's Mandatory Supervision pursuant to Penal Code Sections 1170(h)(5)(B) and 1203.2, on any and all such grants, utilizing the same evidence, at the preliminary hearing. Defense to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

Pursuant to PENAL CODE SECTION 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by PENAL CODE SECTION 1054.3.

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant JACQUELINE MA in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER CS325550, CONSISTS OF 19 COUNTS.

Executed at City of Chula Vista, County of San Diego, State of California, on July 25, 2023.

\_\_\_\_\_  
COMPLAINANT



-----  
INFORMATION

SUMMER STEPHAN  
District Attorney  
County of San Diego  
State of California  
by:

\_\_\_\_\_  
Date

\_\_\_\_\_  
Deputy District Attorney