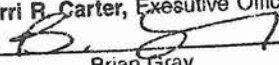


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County of Los Angeles

JAN - 5 2021

Sherri B. Carter, Executive Officer/Clerk  
By  Deputy  
Brian Gray

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES

10 THE PEOPLE OF THE STATE OF CALIFORNIA  
11 (SAN DIEGO DISTRICT ATTORNEY),

12 Plaintiff,

13 v.

14 RHETT MCKENZIE NELSON,

15 Defendant.

CT No. BA478606  
DA No. 39761676

**SAN DIEGO DISTRICT  
ATTORNEY'S WITHDRAWAL OF  
CONSENT TO TRY SAN DIEGO  
CRIMES IN LOS ANGELES  
(COUNTS 6 -10)**

(Pen. Code, §§ 786, 790)

Date: January 11, 2021  
Time: 8:30 a.m.  
Dept: 50 (Clara Shortridge Foltz)

19 Comes now the plaintiff, the People of the State of California, by and through their  
20 attorneys, SUMMER STEPHAN, San Diego District Attorney, and MARTIN E. DOYLE, Deputy  
21 District Attorney, respectfully submits the following San Diego District Attorney's Withdrawal  
22 of Consent to Try San Diego Crimes in Los Angeles.

23 **INTRODUCTION**

24 Over the course of four days in 2019, the defendant went on a two-county crime spree  
25 that began with 5 separate armed robberies in San Diego County and culminated in the merciless  
26 and predatory slaughter of two unsuspecting and innocent citizens in Los Angeles County.  
27 Under normal circumstances, the District Attorney in the county with the armed robberies would  
28 permit the District Attorney in the county with the murders to try all counts together so that a

1 combined prosecution could take place, saving precious judicial resources and ensuring a  
2 punishment that guaranteed the murder/armed robber would never again be released into our  
3 communities. Indeed, that is what San Diego District Attorney Summer Stephan did on February  
4 24, 2020 when a letter granting her permission was sent to the then-Los Angeles District  
5 Attorney to try the five San Diego County armed robberies in Los Angeles County. This letter  
6 was predicated on the state of the prosecution at the time where the complaint in Los Angeles  
7 included the multiple murder special circumstance and firearm enhancements against the  
8 defendant. In this motion, and the attached letter, we note the change in circumstances.

9       The circumstances presently before the court have changed in a drastic and substantial  
10 way causing the San Diego District Attorney to withdraw her letter granting jurisdiction to Los  
11 Angeles. The new Los Angeles District Attorney has announced that he will move this court to  
12 dismiss the special circumstances and the firearm allegations that are presently alleged in the  
13 complaint in the interests of justice.<sup>1</sup> The San Diego District Attorney does not believe that these  
14 actions are in the interests of justice and believes that they violate the law and the constitutional  
15 protections granted to victims by Marsy's law. Due to recent changes in the law, this will make  
16 the defendant eligible for parole even if convicted of both murders, the attempted murder, and  
17 all seven armed robberies after only 20 years. Further, the new Los Angeles District Attorney's  
18 written directives provide that a Los Angeles Deputy District Attorney cannot appear at parole  
19 hearings regardless of the dangerousness of offenders to advocate against release to a parole  
20 board. Also these directives for dismissing special allegations do not take into account Marsy's  
21 rights of the victims or any consideration of their position which is a constitutional violation that  
22 we cannot have our cases be a part of as we want to fulfill our duties to our San Diego County  
23 victims.

24 ///

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25  
26 <sup>1</sup> When questioned by a local media outlet about this case specifically, the LADA's spokesman said: "The defendant is facing  
27 a sentence of 40 years to life in prison, but there is no sentence that can undo the harm caused in this case. If convicted, there  
28 is a possibility that decades from now, the parole board could determine he's been rehabilitated. Such a determination, many  
years from now, would ultimately be a reflection of a system and the public alike weighing their continued interest in  
incarcerating a man who no longer poses a threat to society at an extraordinary taxpayer cost. Eliminating that remote  
possibility today may not be in the public's interest decades from now."

Regardless of what this court does with the Los Angeles District Attorney's (LADA) dismissal motions and regardless of what the LADA ultimately does if this defendant is considered for release on parole, the San Diego District Attorney no longer has confidence in the Los Angeles District Attorney's ability to prosecute counts 6 through 10 of the current complaint. Accordingly, we withdraw any consent given to have those counts prosecuted by the Los Angeles District Attorney. We want to fulfill our duties under the law and the constitution to our San Diego County victims and community.

## STATEMENT OF THE FACTS AND CASE

## The Crime Spree: Robbery & Murders

The defendant left his home in St. George, Utah in late May of 2019. Just before midnight on June 7, 2019, he walked into a 7-11 convenience store at 4205 Voltaire Street in the City of San Diego (Ocean Beach neighborhood). The defendant produced a semi-automatic firearm and demanded the contents of the cash register (count 6). About an hour later he hit up the 7-11 at 3185 Midway in the City of San Diego (Sports Arena area). He robbed that clerk also using a firearm (count 7). That afternoon, he robbed a clerk at the 7-11 on 7607 Broadway in the City of Lemon Grove. He selected a Red Bull energy drink, approached the clerk, lifted up his shirt to expose the semi-automatic firearm in his waistband, and demanded the contents of the cash register. When the clerk opened the register for him, the defendant stole its contents (\$200-\$300 in cash) (count 8). Around 11 pm, also on October 8, he attempted to rob a 7-11 on Gateway Drive in the City of San Diego. The defendant approached the clerk, placed a nylon lunch pail on the counter, exposed a firearm and demanded that the clerk place the money from the register in "the box" (count 9). The clerk did not comply. At 2:30 in the morning the following day, October 9, the defendant robbed a Circle-K convenience store at 7602 El Camino Real in the City of Carlsbad. He selected a drink from the cooler, approached the clerk, and pulled a gun out of his waistband. After the clerk opened the register, the defendant reached in, took the money, and left (count 10).

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1 The defendant then drove north. Just before 5pm on October 10, for no apparent reason,  
2 he began shooting from his Kia Sorrento<sup>2</sup> at a group of skateboarders. He shot one of them, 31-  
3 year Dimitri Koltsov, in the head. Mr. Koltsov died (count 1). He then drove to a Jack-in-the-  
4 Box in Alhambra. About 3hours after murdering Mr. Koltsov, he pulled out a handgun and, for  
5 not decipherable reason, shot off-duty Los Angeles Sheriff's Deputy Joseph Gilbert Santos  
6 twice in the head. Deputy Santos would die two days later (Count 3). Driving to Long Beach, he  
7 completed his crime spree later that day by robbing a Shell Gas Station and a 7-11, both in Long  
8 Beach and both with a gun (counts 4 & 5). The 7-11 clerk reported that while he was being  
9 robbed, the defendant said: "I just killed two people right now, don't act stupid."

10 After being notified by the defendant's father about his son's possible involvement in the  
11 crime spree, the defendant was arrested the following day at a church parking lot driving the Kia  
12 Sorrento. Clothing linking him to surveillance videos and witnesses accounts was found during  
13 a search of the car.

#### 14 15 **Initial Charges & Amended Complaint**

16 On June 13, 2019, the defendant was charged in a criminal complaint filed by the then-  
17 LADA with the murders of Mr. Koltsov and Deputy Solano, as well as the Long Beach  
18 robberies. The complaint included special circumstance allegations of multiple murders (Pen.  
19 Code, § 190.2, subd. (a)(3)) and murder by means of discharging a firearm from a motor vehicle  
20 (Pen. Code, § 190.2, subd. (a)(21) as well as allegations of using a handgun in the commission  
21 of the crimes (Pen. Code, § 12022.53, subs. (b) & (d)). He was arraigned the same day.

22 After further investigation, the Los Angeles District Attorney filed the present amended  
23 felony complaint on February 7, 2020, adding the 5 San Diego armed robberies (Exhibit 1). On  
24 February 24, 2020, the San Diego District Attorney sent a letter to the LADA (Exhibit 2). In that  
25 letter, it was agreed that jurisdiction for the San Diego County robberies lay in both counties and  
26 ///

27  
28 \_\_\_\_\_  
<sup>2</sup> The car was later linked through surveillance video driving away from the scenes of the robberies in San Diego.

1 that we would, at that time, agree to the venue being in Los Angeles County and that the LADA  
2 could prosecute those crimes.

3 To this date that complaint remains pending. No trial has occurred. Indeed, no  
4 preliminary examination has taken place.

5 **“Special Directives” and Changes in the Law**

6 In 2017, the California Legislature enacted Penal Code section 3055, so-called “Elder  
7 Parole (Stats. 2017, ch. 676, § 3 (A.B. 1448). It went into effect January 1, 2018 (Cal. Const.,  
8 art. IV, sec. 8(c)(2)). Elder parole provides that regardless of the length of the term imposed by  
9 the trial court at sentencing, an inmate will get a parole hearing and a chance at release from  
10 state prison after having both: 1) turned sixty years old; and 2) served at least 25 years of their  
11 current sentence. This applies regardless of whether the sentence is determinate (i.e. “50 years”)  
12 or indeterminate (i.e. “100 years to life”). The only inmates that are excluded are inmates  
13 sentenced to life without the possibility of parole, death, or sentenced pursuant to the Three  
14 Strikes Law (subdivision (g)).<sup>3</sup> This defendant is thirty years old. So if no special circumstances  
15 were imposed, as of last year he would have been eligible for parole after only 30 years,  
16 regardless of the sentence imposed by this court (i.e. “40 to life,” “100 years,” etc.).

17 However, the law further changed as of the first of this year. Last session the legislature  
18 passed A.B. 3234. That bill further dropped the age ranges for elder parole. Any inmate (except  
19 those facing special circumstances or three strike enhancements) will be eligible for “elder  
20 parole” after turning age 50 and serving only 20 years. Thus, unless special circumstances are  
21 imposed in this case, this defendant will get a parole hearing in 20 years even if convicted of  
22 both murders and all 7 robberies.

23 On December 7, 2020, a new District Attorney was sworn into office in Los Angeles.  
24 Within hours of his election, he announced a series of “special directives” to his deputies. He  
25 announced that under no circumstances would he seek the death penalty (Special Directive 20-  
26

27 <sup>3</sup> An inmate who kills a police officer while in the line of duty or in retaliation for performing his duties is also excluded  
28 (subdivision (h)). However, this disqualifier likely would not exclude this defendant. Deputy Solano was a stranger to him  
and in civilian clothes. It is our understanding that Deputy Solano was waiting for his fast food order while getting an oil  
change for his ill mother’s car at a nearby Jiffy Lube.



1 11). He also announced that he would not seek any sentencing enhancement and would direct  
2 his deputies to seek the dismissal of any sentencing enhancement in any case that had already  
3 been filed (Special Directive 20-08). This includes all special circumstance allegation: "Special  
4 Circumstances allegations resulting in an LWOP sentence shall not be filed, will not be used for  
5 sentencing, and shall be dismissed or withdrawn from the charging document;" (*Id.*, at p. 2). He  
6 will also not seek any firearm enhancements and will move to dismiss those already filed  
7 (Special Directive, 20-08.2).<sup>4</sup> Under no circumstance will he allege a prior conviction allegation.

8 The effect of these changes—if this court allows them to be implemented—is that even if  
9 this defendant went to trial and were found guilty of all these charges, **he would get a parole**  
10 **hearing in 20 years.** Los Angeles District Attorney George Gascon's new "Special Directive"  
11 concerning parole hearings will not even allow a deputy from his office to show up at that  
12 hearing to oppose the defendant's release no matter how poorly he behaves in prison. "This  
13 Office's default policy is that **we will not attend parole hearings and will support in writing**  
14 **the grant of parole for a person who has already served their mandatory minimum period**  
15 **of incarceration**, defined as their MEPC, YEPD or EPD. However, if the CDCR has  
16 determined in their Comprehensive Risk Assessment that a person represents a 'high' risk for  
17 recidivism, the DDA may, in their letter, take a neutral position on the grant of parole." (Special  
18 Directive 20-14, p.8). The sum effect of DA Gascon's directives and his specific action in this  
19 case amounts **this double-murdering serial armed robber being released in 20 years** since  
20 his Parole date (YEPD) is only 20 years under a non-special circumstance sentence, regardless  
21 of what sentence this court imposes without the special circumstances.

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<sup>4</sup> The policy was amended to allow for a few enhancements not relevant in this prosecution to be filed (Directive, 20-08.2)

1 THE CIRCUMSTANCES OF THIS CASE HAVE BEEN SO DRASTICALLY ALTERED  
2 TO JUSTIFY THE WITHDRAWAL OF THE GRANTING OF JURISDICTION OVER  
3 THE FIVE SAN DIEGO ARMED ROBBERIES TO LOS ANGELES AS IT NO  
4 LONGER SERVES THE INTERESTS OF THE LAW, THE CONSTITUTIONAL  
5 RIGHTS OF VICTIMS, NOR PUBLIC SAFETY

6 Since no murders occurred in San Diego County and the defendant is not a Three-Striker,  
7 under the current state laws and the policies of the LADA, the San Diego District Attorney's office  
8 cannot prevent the defendant from having a parole hearing one day. However, if the counts that  
9 occurred in San Diego are tried in San Diego, we will not dismiss the provable gun allegations as  
10 they brought additional terror to our innocent victims who are mostly store clerks trying to make  
11 an honest living and we will review all information and take a position consistent with the facts  
12 and the law at future parole hearings, and we will abide by the constitutional mandate under  
13 Marsy's law to keep victims informed and to respectfully weight their input. . "[E]xcept as  
14 otherwise provided by law the jurisdiction of every public offense is in any competent court within  
15 the territorial jurisdictional territory of which it is committed" (Pen. Code, § 777). Penal Code  
16 section 691, subdivision (b) defines the "jurisdictional territory" of a superior court as "the county  
17 in which the court sits." The terms "venue" and "territorial jurisdiction" are synonymous, and a  
18 criminal offense generally should be prosecuted in the county in which the crime was committed.  
19 (*People v. Simon* (2001) 25 Cal.4th 1082, 1095–1096). "[V]enue provisions also serve to protect  
20 the interests of the community in which a crime or related activity occurs, 'vindicat[ing] the  
21 community's right to sit in judgment on crimes committed within its territory.'" (*People v. Thomas*  
22 (2012) 53 Cal.4th 1276, 1282).

23 There are statutory exceptions to the general rule that a crime should be prosecuted in the  
24 county where it is committed. (*Id.*, at p. 1283; Pen. Code, §§ 777-790, et seq.) Penal Code section  
25 786 allows for a robbery to be prosecuted in a jurisdiction where the goods were stolen *or* into  
26 which the goods were brought (See, *People v. Tamble* (1992) 5 Cal.App.4th 815). Here, the San  
27 Diego District Attorney initially permitted a prosecution under Penal Code section 786.5,  
28 permitting a "theft" offense to be prosecuted in a county where the theft or receipt of stolen goods



1 occurred, a county where the merchandise was recovered, or in any county where the defendant  
2 did an act that instigated, procured, promoted, or aided and abetted the theft.<sup>5</sup> Although unlike  
3 Penal Code section 784.7 (multi-county jurisdiction for sexual assault, domestic violence, and  
4 child abuse cases), sections 786 and 786.5 do not have any formal procedure whereby one district  
5 attorney necessarily confers jurisdiction on another at the outset of the prosecution. And none of  
6 the statutory venue exception statutes has an express provision in the statutes to “take back” venue,  
7 or contain any provisions about a dispute between counties seeking to try offenses, or what  
8 happens if there is one.

9       The circumstance of this case have so drastically been altered from the time that permission  
10 was granted conferring jurisdiction to Los Angeles County regarding the 5 San Diego armed  
11 robbery counts as our reasonable understanding at that time was that the law would be followed  
12 and the LADA would seek life without the possibility of parole for the two murders and robberies.  
13 This change was not something we could have predicted as we relied on the concept that  
14 prosecutors must follow the law and the constitution. The San Diego District Attorney withdraws  
15 its previous permission afforded to Los Angeles to prosecute offenses that occurred “within the  
16 territorial jurisdictional territory of which [they were] committed.” The charges should return to  
17 San Diego so that the default rules of Section 777 prevail. We plan on filing those counts in a  
18 complaint in San Diego County Superior Court and we plan on prosecuting those counts in  
19 accordance with the law and the constitution.

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27 <sup>5</sup> The statute actually sunsets on July 1, 2021. It is a new statute enacted to combat “organized retail theft.” When the new  
28 crime of “Shoplifting” (Pen. Code, § 490.4 & 490.5) restricted many felony prosecutions and Proposition 47 made many  
other theft crimes misdemeanors, some criminal took advantage of these changes in sophisticated rings of individuals who  
avoided felony prosecution.



1 CONCLUSION

2 Having withdrawn our permission to prosecute counts 6 – 10 of the current amended  
3 complaint in Los Angeles Superior Court, the San Diego District Attorney respectfully requests  
4 that the Los Angeles District Attorney be barred from prosecuting the offenses that occurred in  
5 San Diego County in Los Angeles Superior Court.

6 DATED: January 5, 2021.

Respectfully submitted,

7 SUMMER STEPHAN

8 District Attorney

9  
10 By:

  
11 MARTIN E. DOYLE

12 Deputy District Attorney

13 Attorneys for Plaintiff  
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# **EXHIBIT A**



DAVID P. GREENBERG  
ASSISTANT DISTRICT ATTORNEY

OFFICE OF  
**THE DISTRICT ATTORNEY**  
COUNTY OF SAN DIEGO  
SUMMER STEPHAN  
DISTRICT ATTORNEY

San Diego  
330 West Broadway  
San Diego, CA 92101  
(619) 531-4040  
<http://www.sdcda.org>

January 4, 2021

The Honorable George Gascón  
District Attorney  
Los Angeles County District Attorney's Office  
211 West Temple Street  
Suite 1200  
Los Angeles, CA 90012

Re: *People v. Rhett Nelson*  
Los Angeles County Court Case #BA478606  
DA #39761676

Dear District Attorney Gascón,

I write to revoke my grant of jurisdiction to Los Angeles County over five armed robberies committed by Rhett Nelson that occurred in San Diego County between June 7, 2019 and June 9, 2019. Previously on February 24, 2020, resulting from months of discussion with your office, the San Diego County District Attorney's Office granted the Los Angeles County District Attorney's Office permission to prosecute Mr. Nelson for this series of five separate armed robberies. Your office charged these crimes on your amended felony complaint BA478606 as counts 6 through 10.

San Diego's grant of jurisdiction was based upon certain representations by your office that have been retracted, my grant of jurisdiction must be revoked and prosecution of the five armed robberies should be returned to San Diego County.

The decision in February 2020 to forgo a local prosecution in San Diego County in lieu of consolidating the crimes in one jurisdiction was based upon the commitment by the Los Angeles County District Attorney's Office that Mr. Nelson would be prosecuted for two separate homicides with special circumstances and firearm allegations, as well as attempted murder and robbery with firearm allegations. Your office represented that Mr. Nelson would face life without the possibility of parole.

Instead, based on your recent pronouncements, it is now apparent that you intend to dismiss the special circumstance allegations as to the homicides and additionally dismiss the firearms allegations on all counts. This conclusion is based on your publicly announced special directives issued on December 7th and 18th instructing your prosecutors to take these actions. The dismissal of these lawful allegations that are designed to ensure public safety fundamentally

alters the basis for our grant of jurisdiction to the Los Angeles County District Attorney's Office for the prosecution of the San Diego County robberies. We are therefore formally requesting to retake jurisdiction of the crimes that occurred in San Diego County so they may be prosecuted to the extent that law and justice requires for the safety of the public.

Your stated policy to strike the special circumstance allegations and firearms allegations in this case would allow this defendant to be eligible for "elderly parole" which recent amendments now permits at age 50. Under your policy, this violent defendant, responsible for two killings and multiple robberies, would be eligible for parole in 20 years — a result not conducive to public safety. Further, your publicly announced special directives prohibiting your prosecutors to attend any lifer hearing or oppose any release on parole means your office will be silent and absent when these important hearings occur. Because victims are not entitled to receive information from the inmate's prison file, including behavioral and risk assessment data, they would be alone at the hearing, without sufficient information to meaningfully assist the board to determine whether an inmate is suitable for parole—especially when denial is the appropriate result. When questioned about your special directives by your local FOX affiliate and whether or not they will be applied to this case, your spokesperson confirmed that would be the case and that your office may move to dismiss the special circumstances as early as Monday, January 11, 2021.

From everything I studied regarding this case, I did not see that the families of the two innocent human beings who were shot in the head and received instant death sentences had been given a any opportunity to weigh-in on your decisions as the Constitution requires. And certainly none of the innocent store clerks who were robbed at gun point in San Diego County were allowed to provide input on whether 20 years in prison served the interests of justice or public safety. I cannot be an unwilling participant to your actions and decisions by continuing to allow your office to prosecute the San Diego robberies. Such action would be detrimental to public safety and would result in an abdication of my duties to San Diego's victims under the constitutional mandates of *Marsy's Law*; this I will not do. As prosecutors, we must comply with the law.

I do not want our San Diego County cases to be connected to any publicly-announced special directive that dismisses special circumstances and serious gun use allegations where your stated reason is "in the interest of justice" when clearly the facts of this defendant's multiple violent offenses show it is not. This defendant not only victimized numerous citizens at gunpoint, but also ruthlessly executed two victims leaving behind a wake of destruction. I don't know if you have ever had the misfortune of actually looking into the eyes of a victim terrorized at gunpoint, or who has had their loved one executed to never return to them, or a victim who has been raped or sold for sex, but I have. I have looked into those eyes as a line prosecutor and continue to do so as the elected District Attorney. I can assure you that it gives you a humility and compassion that makes you faithfully follow the law and fulfill your oath.

Therefore, I hereby revoke authorization for Los Angeles County's prosecution of Rhett Nelson for the five San Diego County robberies. I respectfully request your office move to dismiss the San Diego County robbery charges without prejudice from your case so that my office can initiate prosecution of those offenses expeditiously. I have simultaneously filed a motion in superior court requesting the same as in this letter. I hope we do not have to further litigate this matter.



*On a personal note, I would like to add that I wish our first interaction with you as LA DA was not of this nature as we had good and professional interactions when you were the DA for San Francisco. It is just that I don't have the luxury of niceties when it comes to my duty to serve as District Attorney. I also want to be clear that this letter absolutely does not show deviation from my efforts to pursue responsible criminal justice reform and pursuit of justice by reducing incarceration that is not commensurate with the crime. Responsible criminal justice reform is something I fervently believe in and have undertaken in San Diego County with proven results where our DA Community Justice Initiative with an evidence-based diversion program has diverted and cleared records for hundreds of non-violent offenders with a recidivism rate of less than 3 percent. As you know, this low recidivism rate is not found anywhere else in our nation. We have also created a crime prevention hub that has helped thousands of San Diegans and doubled our alternatives to custody with Drug, Veterans and Mental Health Treatment Courts. Our reform efforts are not only effective but also accomplished without violating the law, unjustly releasing violent criminals, and while fully honoring victims' rights, protecting public safety and acting with absolute ethics and professionalism. As always, I would be glad to talk to you and share the San Diego innovations with you.*

Sincerely,



Summer Stephan

San Diego County District Attorney

# SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA  
(SAN DIEGO DISTRICT ATTORNEY)

Plaintiff,

vs.

RHETT MCKENZIE NELSON,

Defendant.

Case No. BA478606

D.A. No. 39761676

**PROOF OF SERVICE BY MAIL**  
**CCP S 1013A AND 2015.5**

I, the undersigned, declare as follows:

I am employed in the county of San Diego, over eighteen years of age and not a party to the within action. My business address is 330 West Broadway, San Diego, CA 92101.

On January 4, 2021, I served a copy of the within SAN DIEGO DISTRICT ATTORNEY'S WITHDRAWAL OF CONSENT TO TRY SAN DIEGO CRIMES IN LOS ANGELES (COUNTS 6-10) to the interested parties in the within action by placing a true copy thereof enclosed in a sealed envelope, with postage fully prepaid, in the United States Mail at 330 West Broadway, San Diego, CA 92101, addressed as follows:

Antonella Nistorescu Deputy District Attorney Los Angeles County District Attorney 211 W Temple St FL 11 Los Angeles, CA 90012-4455	Jenn Bartick Michael Maguire & Associates 611 Anton Blvd, Ste 900 Costa Mesa, CA 92626-7684
Via Certified Mail 7018 3090 0001 2149 2038 The Honorable George Gascón District Attorney Los Angeles County District Attorney's Office 211 W Temple St, Suite 1200 Los Angeles, CA 90012	

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on January 4, 2021, at 330 West Broadway, San Diego, CA 92101.

January 4, 2021  
Date

Norlice Smith  
Norlice Smith