# TULARE COUNTY SUPERIOR COURT DISTRICT VISALIA DIVISION, STATE OF CALIFORNIA

THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff,

DA No. 22-0020996

Court No. VCF430002A-F

VS.

ARMANDO TORRES-DELGADO DOB: 07/15/1978

AKA: ARMANDO DELGADO AKA: ARMANDO TORRES FELONY COMPLAINT FIRST AMENDED

AMPARO TORRES DOB: 12/05/1976

ARMANDO TORRES-GARCIA DOB: 09/01/2003

JUVENTINO DELGADO TORRES DOB: 12/10/1984

OSWALD LOPEZ-IBARRA DOB: 05/29/2000

AKA: OSWALD LOPEZ DOB: 05/27/2000

AKA: OSWALD LOPEZ-IBARRA DOB: 05/27/2000

CRISTIAN OROZCO TORRES DOB: 12/27/1994 AKA: CRISTIAN TORRES OROZCO DOB: 12/27/1994 AKA: CRISTIAN OROZCO TORRES DOB: 12/27/1994

Defendant(s).

The undersigned is informed and believes that:

# **COUNT 1**

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of HUMAN TRAFFICKING OF A MINOR FOR A COMMERCIAL SEX ACT, in violation of PENAL CODE SECTION 236.1(C)(1), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., JUVENTINO DELGADO TORRES, OSWALD LOPEZ-IBARRA & CRISTIAN OROZCO TORRES, who did willfully and unlawfully cause, induce and/or persuade, T.A, who was less than 18 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a violation of Penal Code section 266h/266i.

# **COUNT 2**

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of HUMAN TRAFFICKING OF A MINOR FOR A COMMERCIAL SEX ACT, in violation of PENAL CODE SECTION 236.1(C)(1), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., JUVENTINO DELGADO TORRES, OSWALD LOPEZ-IBARRA & CRISTIAN OROZCO TORRES, who did willfully and unlawfully cause, induce and/or persuade, G.E who was less than 18 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a violation of Penal Code section 266h/266i.

# **COUNT 3**

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of HUMAN TRAFFICKING OF A MINOR FOR A COMMERCIAL SEX ACT, in violation of PENAL CODE SECTION 236.1(C)(1), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., JUVENTINO DELGADO TORRES, OSWALD LOPEZ-IBARRA & CRISTIAN OROZCO TORRES, who did willfully and unlawfully cause, induce and/or persuade, T.A, who was less than 18 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a violation of Penal Code section 266h/266i.

# **COUNT 4**

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of HUMAN TRAFFICKING OF A MINOR FOR A COMMERCIAL SEX ACT, in violation of PENAL CODE SECTION 236.1(C)(1), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., JUVENTINO DELGADO TORRES, OSWALD LOPEZ-IBARRA & CRISTIAN OROZCO TORRES, who did willfully and unlawfully cause, induce and/or persuade, E.G , who was less than 18 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a violation of Penal Code section 266h/266i.

# **COUNT 5**

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of HUMAN TRAFFICKING, in violation of PENAL CODE SECTION 236.1(A), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., JUVENTINO DELGADO TORRES, OSWALD LOPEZ-IBARRA & CRISTIAN OROZCO TORRES, who did willfully and unlawfully deprive and/or violate the personal liberty of Y.S with the intent to obtain forced labor or services.

### COUNT 6

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of HUMAN TRAFFICKING OF A MINOR FOR A COMMERCIAL SEX ACT, in violation of PENAL CODE SECTION 236.1(C)(1), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., JUVENTINO DELGADO TORRES, OSWALD LOPEZ-IBARRA & CRISTIAN OROZCO TORRES, who did willfully and unlawfully cause, induce and/or persuade, JANE DOE #1, who was less than 18 years of age, to engage in a commercial sex act, with the intent to effect and/or maintain a violation of Penal Code section 266h/266i.

# **COUNT 7**

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of FORCIBLE RAPE, in violation of PENAL CODE SECTION 261(A)(2), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., who did unlawfully have and accomplish an act of sexual intercourse with a person, to wit, S.C., not his spouse, against said person's will, by means of force, violence, duress, menace and fear of immediate and unlawful bodily injury on said person and another, to wit, FIRST TIME.

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

"NOTICE: Conviction of this offense will require to register pursuant to Penal Code section 290 et seq. Willful failure to register is a crime."

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

# **COUNT 8**

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of FORCIBLE RAPE, in violation of PENAL CODE SECTION 261(A)(2), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., who did unlawfully have and accomplish an act of sexual intercourse with a person, to wit, S.C, not his spouse, against said person's will, by means of force, violence, duress, menace and fear of immediate and unlawful bodily injury on said person and another, to wit, SECOND TIME.

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

"NOTICE: Conviction of this offense will require to register pursuant to Penal Code section 290 et seq. Willful failure to register is a crime."

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

# COUNT 9

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of SEXUAL BATTERY, in violation of PENAL CODE SECTION 243.4(E)(1), a Misdemeanor, was committed by ARMANDO TORRES-DELGADO, SR., JUVENTINO DELGADO TORRES & OSWALD LOPEZ-IBARRA, who did willfully and unlawfully touch an intimate part of S.C, against the will and for the specific purpose of sexual arousal, sexual gratification and sexual abuse.

# COUNT 10

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of CONTACT WITH MINOR FOR SEXUAL OFFENSE, in violation of PENAL CODE SECTION 288.3(A), a Felony, was committed by ARMANDO TORRES-DELGADO, SR. & JUVENTINO DELGADO TORRES, who did unlawfully contact and communicate with a minor S.C, knowing that S.C was a minor, with the intent to commit an offense specified in Penal Code Section 207, 209, 261, 264.1, 273a, 286, 288, 288.2, 287, 289, 311.1, 311.2, 311.4, and 311.11 involving.

"NOTICE: Conviction of this offense will require to register pursuant to Penal Code section 290 et seq. Willful failure to register is a crime."

# COUNT 11

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of SEXUAL BATTERY, in violation of PENAL CODE SECTION 243.4(E)(1), a Misdemeanor, was committed by CRISTIAN OROZCO TORRES, who did willfully and unlawfully touch an intimate part of Y.S, against the will and for the specific purpose of sexual arousal, sexual gratification and sexual abuse.

# COUNT 12

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of PENAL CODE SECTION 261.5(C), a Felony, was committed by CRISTIAN OROZCO TORRES, who engaged in an act of unlawful sexual intercourse with E.G, a minor, not the spouse of the defendant, the minor being more than three years younger than the defendant.

"NOTICE: Being charged with this criminal offense can result in mandatory pre-conviction HIV/AIDS testing and disclosure of the results to a victim and the Chief Medical Officer of the jail or prison facility where you are incarcerated pursuant to Penal Code Section 1524.1and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order."

# COUNT 13

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of CONTACT WITH MINOR FOR SEXUAL OFFENSE, in violation of PENAL CODE SECTION 288.3(A), a Felony, was committed by JUVENTINO DELGADO TORRES, who did unlawfully contact and communicate with a minor G.E, knowing that G.E was a minor, with the intent to commit an offense specified in Penal Code Section 207, 209, 261, 264.1, 273a, 286, 288, 288.2, 287, 289, 311.1, 311.2, 311.4, and 311.11 involving G.E.

"NOTICE: Conviction of this offense will require to register pursuant to Penal Code section 290 et seq. Willful failure to register is a crime."

### COUNT 14

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of PENAL CODE SECTION 261.5(C), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., who engaged in an act of unlawful sexual intercourse with T.A, a minor, not the spouse of the defendant, the minor being more than three years younger than the defendant, to wit, FIRST TIME.

"NOTICE: Being charged with this criminal offense can result in mandatory pre-conviction HIV/AIDS testing and disclosure of the results to a victim and the Chief Medical Officer of the jail or prison facility where you are incarcerated pursuant to Penal Code Section 1524.1and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order."

#### COUNT 15

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of PENAL CODE SECTION 261.5(C), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., who engaged in an act of unlawful sexual intercourse with T.A, a minor, not the spouse of the defendant, the minor being more than three years younger than the defendant, to wit, SECOND TIME.

"NOTICE: Being charged with this criminal offense can result in mandatory pre-conviction HIV/AIDS testing and disclosure of the results to a victim and the Chief Medical Officer of the jail or prison facility where you are incarcerated pursuant to Penal Code Section 1524.1and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order."

# **COUNT 16**

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of PENAL CODE SECTION 261.5(C), a Felony, was committed by JUVENTINO DELGADO TORRES, who engaged in an act of unlawful sexual intercourse with T.A, a minor, not the spouse of the defendant, the minor being more than three years younger than the defendant, to wit, FIRST TIME.

"NOTICE: Being charged with this criminal offense can result in mandatory pre-conviction HIV/AIDS testing and disclosure of the results to a victim and the Chief Medical Officer of the jail or prison facility where you are incarcerated pursuant to Penal Code Section 1524.1and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order."

# **COUNT 17**

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of PENAL CODE SECTION 261.5(C), a Felony, was committed by OSWALD LOPEZ-IBARRA, who engaged in an act of unlawful sexual intercourse with L.T, a minor, not the spouse of the defendant, the minor being more than three years younger than the defendant.

"NOTICE: Being charged with this criminal offense can result in mandatory pre-conviction HIV/AIDS testing and disclosure of the results to a victim and the Chief Medical Officer of the jail or prison facility where you are incarcerated pursuant to Penal Code Section 1524.1and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order."

# **COUNT 18**

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of CONTACT WITH MINOR FOR SEXUAL OFFENSE, in violation of PENAL CODE SECTION 288.3(A), a Felony, was committed by ARMANDO TORRES-GARCIA, JR., who did unlawfully contact and communicate with a minor T.A, knowing that T.A was a minor, with the intent to commit an offense specified in Penal Code Section 207, 209, 261, 264.1, 273a, 286, 288, 288.2, 287, 289, 311.1, 311.2, 311.4, and 311.11 involving T.A.

"NOTICE: Conviction of this offense will require to register pursuant to Penal Code section 290 et seq. Willful failure to register is a crime."

#### COUNT 19

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of MEETING MINOR FOR LEWD PURPOSES, in violation of PENAL CODE SECTION 288.4(B), a Felony, was committed by ARMANDO TORRES-GARCIA, JR., who did unlawfully and motivated by an unnatural and abnormal sexual interest in children, arrange a meeting with T.A, a minor and a person defendant(s) ARMANDO TORRES-GARCIA, JR. believed to be a minor, for the purpose of exposing the genitals and pubic and rectal area of T.A and defendant(s) ARMANDO TORRES-GARCIA, JR., and to engage in lewd and lascivious behavior, and did go to the arranged meeting place at and about the arranged time.

"NOTICE: Conviction of this offense will require to register pursuant to Penal Code section 290 et seq. Willful failure to register is a crime."

# **COUNT 20**

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of UNLAWFUL SEXUAL INTERCOURSE, in violation of PENAL CODE SECTION 261.5(C), a Felony, was committed by ARMANDO TORRES-GARCIA, JR., who engaged in an act of unlawful sexual intercourse with T.A, a minor, not the spouse of the defendant, the minor being more than three years younger than the defendant.

"NOTICE: Being charged with this criminal offense can result in mandatory pre-conviction HIV/AIDS testing and disclosure of the results to a victim and the Chief Medical Officer of the jail or prison facility where you are incarcerated pursuant to Penal Code Section 1524.1and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order."

#### COUNT 21

On or about and between January 1, 2022 and May 30, 2022, in the County of Tulare, the crime of ASSAULT BY MEANS OF FORCE LIKELY TO PRODUCE GREAT BODILY INJURY, in violation of PENAL CODE SECTION 245(A)(4), a Felony, was committed by AMPARO TORRES, who committed an assault on the person of T.A by means of force likely to produce great bodily injury.

# COUNT 22

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of CULTIVATING >6 CANNABIS PLANTS WITH CONCURRENT VIOLATION OF ENVIRONMENTAL LAW, in violation of HEALTH AND SAFETY CODE SECTION 11358(D)(3), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., AMPARO TORRES, JUVENTINO DELGADO TORRES, OSWALD LOPEZ-IBARRA & CRISTIAN OROZCO TORRES, who did unlawfully plant, cultivate, harvest, dry, and process more than six living cannabis plants and any part thereof.

It is further alleged that the above offense resulted in the illegal diversion of water as defined in Water Code section 1052.

# COUNT 23

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(A)(1), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., JUVENTINO DELGADO TORRES, OSWALD LOPEZ-IBARRA & CRISTIAN OROZCO TORRES, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of HUMAN TRAFFICKING, in violation of Section 236.1 of the PENAL Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) ARMANDO TORRES-DELGADO, SR., JUVENTINO DELGADO TORRES, OSWALD LOPEZ-IBARRA & CRISTIAN OROZCO TORRESs committed the following overt act and acts at and in the County of TULARE:

- 1. CONTACTED GIRLS FOR SEX WORK
- 2. BROUGHT GIRLS TO VARIOUS LOCATIONS FOR SEX WORK
- 3. ENGAGED IN SEXUAL ACTS WITH GIRLS
- 4. PAID GIRLS MONEY FOR SEXUAL ACTS.

# COUNT 24

On or about and between January 1, 2021 and May 30, 2022, in the County of Tulare, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(A)(1), a Felony, was committed by ARMANDO TORRES-DELGADO, SR., AMPARO TORRES, JUVENTINO DELGADO TORRES, OSWALD LOPEZ-IBARRA & CRISTIAN OROZCO TORRES, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of CULTIVATING MARIJUANA FOR SALES, in violation of Section 11358 of the HEALTH AND SAFETY Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) ARMANDO TORRES-DELGADO, SR., AMPARO TORRES, JUVENTINO DELGADO TORRES, OSWALD LOPEZ-IBARRA & CRISTIAN OROZCO TORRESs committed the following overt act and acts at and in the County of TULARE:

- 1. OWNED AND OPERATED LOCATIONS FOR MARIJUANA GROWS
- 2. SOLICITED WORKERS TO TEND MARIJUANA
- 3. TRIMMED AND TRANSPORTED MARIJUANA.

\* \* \* \* \* \* \* \*

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.

Pursuant to <u>People v. Cunningham</u>, the People hereby put the defendant on notice that the aggravated sentence may be sought in this case.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 24 COUNT(S).

Executed at VISALIA DIVISION, California, on 06/13/2022.

Katrina Brownson

KATRINA BROWNSON

DEPUTY DISTRICT ATTORNEY

Agency: TULARE COUNTY SHERIFF'S OFFICE

DEFENDANT NAME Armando Torres-Delgado	<u>SEX</u> M	RACE H	<u>HGT</u> 5'11	<u>WGT</u> 230	EYES Brown	HAIR Black	COURT <u>DATE</u> 06/13/22	INTAKE S <u>1A1</u> <u>US</u> ARR
Amparo Torres	F	HL	5'05	157	Brown	Red		WA
Armando Torres-Garcia	M	HL	5'10	140	Brown	Black		WA
Juventino Delgado Torres	F	Н	5'10	200	Brown	Brown		WA
Oswald Lopez-Ibarra	M	Н	5'10	160	Brown	Brown	06/13/22	ARR
Cristian Orozco Torres	M	HL	5'08	180	Brown	Brown		WA

COMPLAINT PROCESSED BY: JS