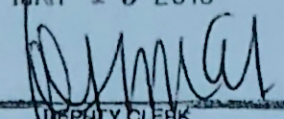


1 KRISHNA ABRAMS
District Attorney of Solano County
2 By: VERONICA JUAREZ SBN 230698
3 Deputy District Attorney
675 Texas St, Suite 4500
4 Fairfield, CA 94533
Telephone: (707) 784-6800
5 Attorney for the People

FILED
Clerk of the Superior Court

MAY 15 2018

By: 
DEPUTY CLERK

6 SUPERIOR COURT OF CALIFORNIA

7 COUNTY OF SOLANO

9 THE PEOPLE OF THE STATE OF)
10 CALIFORNIA,)
11 Plaintiff,)
12 vs.)
13 INA ROGERS,)
14 Defendant.)

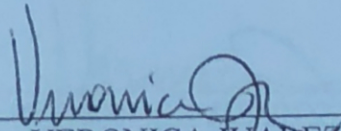
CASE NO. FCR336784

MOTION TO ADVANCE

DATE: 5-16-18
TIME: 8:30
DEPT: 11

16 Please take notice that on 5-16-18, at 8:30 a.m., in Department 11, the People
17 will move the above-entitled Court to advance the pretrial conference in the above-entitled
18 matter from the date currently set.

19 Dated: May 14, 2018

20 By: 
21 VERONICA JUAREZ
22 Deputy District Attorney

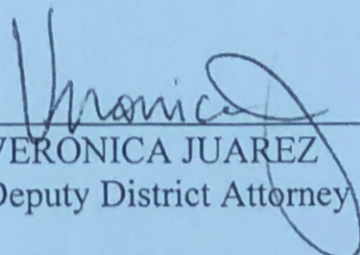
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DECLARATION IN SUPPORT OF MOTION TO ADVANCE

I, the undersigned, do hereby declare and say:

1. I am a duly appointed Deputy District Attorney of the County of Solano, State of California;
2. There is currently a pre-trial conference scheduled in the above-entitled matter on July 16, 2018;
3. Based upon additional investigation learned after the filing of the initial complaint, the People are seeking to amend to add charges against the defendant;
4. Additionally, the People have learned the defendant committed these acts along with Jonathan Allen;
5. Jonathan Allen was arraigned on May 14, 2018 with a readiness conference scheduled for May 24, 2018 at 8:30am in department 11;
6. The Petitioner hereby moves to advance the above-entitled matter to May 24, 2018.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 14, 2018 at Fairfield, California.

BY: 
VERONICA JUAREZ
Deputy District Attorney

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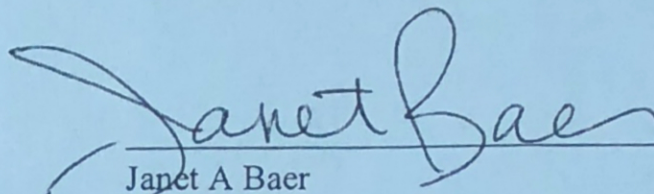
PROOF OF SERVICE

I, the undersigned, certify under penalty of perjury that my business address is the Office of the District Attorney, 675 Texas St., Suite 4500, Fairfield, Solano County and I am not a party to the within entitled action:

On May 15, 2018, I served the attached: **MOTION TO ADVANCE** in *People v. INA ROGERS*, docket # FCR336784, on the defense attorney(s) by:

Hand delivering a copy thereof to the Public Defender.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of May, 2018 at Fairfield, California.


Janet A Baer
Legal Secretary

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PROOF OF SERVICE

I, the undersigned, certify under penalty of perjury that my business address is the Office of the District Attorney, 675 Texas St., Suite 4500, Fairfield, Solano County and I am not a party to the within entitled action:

On May 15, 2018 , I served the attached: **MOTION TO INCREASE BAIL** in *People v. INA ROGERS*, docket # *FCR336784*, on the defense attorney(s) by:

Hand delivering a copy thereof to the Public Defender.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of May, 2018 at Fairfield, California.

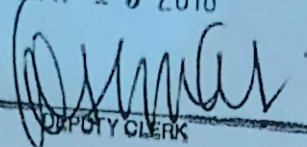
Janet A Baer
Legal Secretary

1 KRISHNA ABRAMS
District Attorney of Solano County
2 By: VERONICA JUAREZ SBN 230698
Deputy District Attorney
3 675 Texas St, Suite 4500
4 Fairfield, CA 94533
Telephone: (707) 784-6800
5 Attorney for the People

FILED
Clerk of the Superior Court

MAY 15 2018

By


DEPUTY CLERK

6 SUPERIOR COURT OF CALIFORNIA

7 COUNTY OF SOLANO

9 THE PEOPLE OF THE STATE OF)
10 CALIFORNIA,)

11 Plaintiff,)

12 vs.)

13 INA ROGERS,)

14 Defendant.)
15 _____)

CASE NO. FCR321282

FCR 336784

MOTION TO INCREASE
BAIL

DATE: May 16, 2018

TIME: 8:30 a.m.

DEPT: 11

17 PLEASE TAKE NOTICE that on at 8:30 a.m., in Department 11 of the above-entitled
18 court, or as soon thereafter as the matter may be heard, the People will move the Court for an
19 order to increase bail in the present case.

20 This motion will be based on the attached memorandum of points and authorities and
21 declaration, all court documents in this case, and evidence and argument presented at the
22 hearing on this motion.
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MOTION TO INCREASE BAIL

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 Trial court judges in each county are required to establish a bail schedule for all
3 felony offenses. (Penal Code §1269b(c).) Judges have discretion to deviate from the
4 schedule, but only upon a finding of "unusual circumstances," which are to be stated on the
5 record. (Penal Code §1275(c).) Penal Code §1289 provides that after the defendant has
6 been admitted to bail, the court may, upon good cause shown, either increase or decrease the
7 bail.
8

9 Penal Code §1289 expressly provides for subsequent motions to increase or reduce
10 bail upon a showing of good cause. However, the good cause must be founded on changed
11 circumstances relating to the defendant or the proceedings, not on the conclusion that
12 another judge in previously setting bail committed legal error. Although not necessarily
13 exhaustive, factors to be considered in "setting, reducing or denying" bail are set forth in
14 Penal Code §1275: protection of the public (the "primary consideration"), seriousness of the
15 offense, previous criminal record, and probability of defendant appearing in court. (See also
16 *In re Berman* (1930) 105 Cal.App 270, 271-272 [proper to consider under §1289 amount of
17 bail posted by defendant in another pending case]; *Ex parte Black* (1934) 140 Cal.App.361
18 [numerous factors]; *In re Grimes* (1929) 99 Cal.App. 10 [moral turpitude of the offense,
19 penalty provided by law].)
20

21 FACTS

22 On March 31, 2018 the Fairfield Police department were called to the defendant's
23 home regarding the report of a missing child. When officers arrived, they entered the
24 defendant's home to find 9 children ranging in age from 6 months to 11 years old huddled
25 together on the living room floor. As officers were in the home they found the home to be in
26

1 deplorable condition. There were clothes, garbage, and feces scattered everywhere. The
2 children appeared to be skittish and spoke with speech impediments. Eventually officers
3 located the missing child sleeping in a neighbor's yard. On March 31, 2018 all of the
4 children were taken from the home and placed into the custody of Child Welfare Services
5 ("CWS"). The defendant was arrested and charged with one count of misdemeanor child
6 abuse.
7

8 While in CWS custody the Fairfield police department continued to investigate the
9 background of the children. It was during the course of this investigation that the children
10 described the physical and emotional abuse at the hands of the defendant and her partner.
11 This information was not known at the time of initial contact from the Fairfield police
12 department on March 31, 2018.

13 During the investigation the children thoroughly described the incidents of abuse. On
14 a continuous basis the children were getting punched, strangled, bitten, shot with weapons
15 such as crossbows and bb guns, hit with weapons such as sticks and bats, subjected to
16 "waterboarding" and having scalding water poured on them. Due to the continuous abuse
17 the children have varying forms of scars, including broken arms. The investigation has
18 shown that the defendant knew about these incidents and assisted with the abuse herself and
19 also failed protect the children from this harmful and violent environment. Further the
20 investigation has shown that the defendant dissuaded the children from reporting these
21 incidents to medical personnel to protect her partner.
22

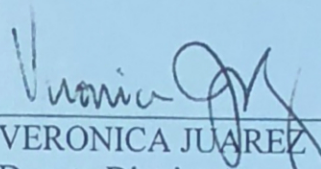
23 While the children are currently under the supervision of CWS, they are still at risk
24 in that the defendant is allowed visitation. Based on her history of dissuading the children
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1 and for their protection, the People seek to request bail be set per schedule in the amount of
2 \$495,000.

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Dated: May 15, 2018

Respectfully submitted,
KRISHNA A. ABRAMS
District Attorney


VERONICA JUAREZ
Deputy District Attorney

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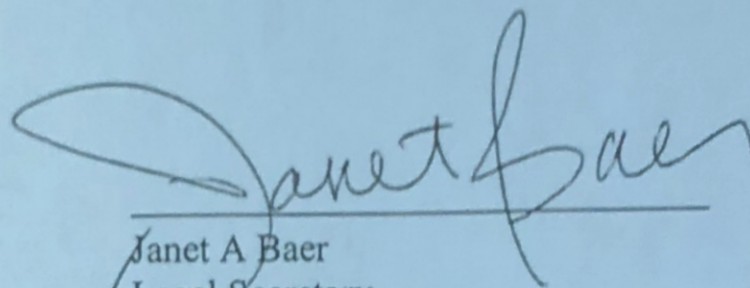
PROOF OF SERVICE

I, the undersigned, certify under penalty of perjury that my business address is the Office of the District Attorney, 675 Texas St., Suite 4500, Fairfield, Solano County and I am not a party to the within entitled action:

On May 15, 2018, I served the attached: **MOTION TO INCREASE BAIL** in *People v. INA ROGERS*, docket # *FCR336784*, on the defense attorney(s) by:

Hand delivering a copy thereof to the Public Defender.

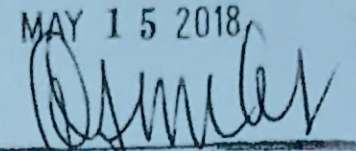
I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of May, 2018 at Fairfield, California.



Janet A Baer
Legal Secretary

FILED
Clerk of the Superior Court

MAY 15 2018

By 
DEPUTY CLERK

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KRISHNA A. ABRAMS
District Attorney of Solano County
By: VERONICA JUAREZ, ##230698
675 Texas St., Suite 4500
Fairfield, CA 94533
Telephone: 707 784-6800

Attorney for the People

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SOLANO

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

vs.

INA ROGERS

Defendant

CASE NO. FCR336784

NOTICE OF MOTION
TO AMEND COMPLAINT
AND POINTS AND
AUTHORITIES IN
SUPPORT OF MOTION

HEARING DATE: May 16, 2018
TIME: 8:30 AM D11

TO THE ABOVE NAMED DEFENDANT AND HIS ATTORNEY:

PLEASE TAKE NOTICE that on May 16 2018, in D11, at 8:30 AM, or as soon thereafter as the
matter may be heard in the above entitled Court, the People will move for an Order of Court
permitting an Amended Complaint to be filed herein, a copy of which is attached hereto.

POINTS AND AUTHORITIES

I

The court in which an action is pending may order or permit an amendment of an indictment, accusation or information, or the filing of an amended complaint, for any defect or insufficiency, at any stage of the proceedings.... The defendant shall be required to plead to such amendment or amended pleading forthwith, or, at the time fixed for pleading, if he has not yet pleaded and the trial or other proceeding shall continue as if the pleading had been originally filed as amended, unless the substantial rights of the defendant would be prejudiced thereby, in which event a reasonable postponement, not longer than the ends of justice require, may be granted. Penal Code Section 1009.

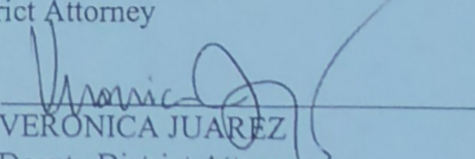
II

In the instant matter, the People respectfully request that the complaint be amended to **add 9 felony counts of PC273a(a), CHILD ABUSE OR ENDANGERING HEALTH OF CHILD.**

Dated: May 15, 2018

Respectfully submitted,

KRISHNA A. ABRAMS
District Attorney

BY: 
VERONICA JUAREZ
Deputy District Attorney

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SOLANO

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff

vs.

INA ROGERS (04/22/1987)
aka: INA A ROGERS
INA AURELIA ROGERS

Defendant

Case No. FCR336784

AMENDED
FELONY COMPLAINT

The undersigned is informed and believes that:

COUNT 1

On or about March 31, 2018, defendant INA ROGERS did commit a misdemeanor namely: CRUELTY TO CHILD BY ENDANGERING HEALTH, a violation of Section 273a(b) of the Penal Code of the State of California, County of Solano, in that said defendant was a person having the care and custody of A. A., A. A., A. A., A. A., J. A., K. A., L. A., M. A., A. J., and N. J., children of 5, 3, 6, 1, 4, 2, 9, 8, 11, and 12 years, who, under circumstances and conditions other than those likely to produce great bodily injury and death, did willfully cause and permit the person and health of said children to be injured, and did willfully cause and permit said children to be placed in such a situation that its person and health may be endangered.

COUNT 2

1 On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN
2 did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a
3 violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in
4 that said defendant did willfully and unlawfully, under circumstances likely to produce great
5 bodily harm and death, injure, cause, and permit a child, N. J., to suffer and to be inflicted with
6 unjustifiable physical pain and mental suffering, and, having the care and custody of said child,
7 injure, cause, and permit the person and health of said child to be injured and did willfully cause
8 and permit said child to be placed in such situation that his/her person and health was/were
9 endangered.

COUNT 3

8 On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN
9 did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a
10 violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in
11 that said defendant did willfully and unlawfully, under circumstances likely to produce great
12 bodily harm and death, injure, cause, and permit a child, A. L. J., to suffer and to be inflicted
13 with unjustifiable physical pain and mental suffering, and, having the care and custody of said
14 child, injure, cause, and permit the person and health of said child to be injured and did willfully
15 cause and permit said child to be placed in such situation that his/her person and health was/were
16 endangered.

COUNT 4

15 On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN
16 did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a
17 violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in
18 that said defendant did willfully and unlawfully, under circumstances likely to produce great
19 bodily harm and death, injure, cause, and permit a child, L. A. A., to suffer and to be inflicted
20 with unjustifiable physical pain and mental suffering, and, having the care and custody of said
21 child, injure, cause, and permit the person and health of said child to be injured and did willfully
22 cause and permit said child to be placed in such situation that his/her person and health was/were
23 endangered.

COUNT 5

22 On or about and between January 18, 2015 and March 30, 2018, defendant JONATHAN ALLEN
23 did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a
24 violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in
25 that said defendant did willfully and unlawfully, under circumstances likely to produce great
26 bodily harm and death, injure, cause, and permit a child, M. K. A., to suffer and to be inflicted
with unjustifiable physical pain and mental suffering, and, having the care and custody of said
child, injure, cause, and permit the person and health of said child to be injured and did willfully
cause and permit said child to be placed in such situation that his/her person and health was/were
endangered.

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COUNT 6

On or about and between April 22, 2016 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in that said defendant did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, A. A. A. (AUR. A.), to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

COUNT 7

On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in that said defendant did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, A. A. A. (AIY. A.), to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

COUNT 8

On or about and between June 21, 2014 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in that said defendant did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, J. M. A., to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

COUNT 9

On or about and between November 26, 2017 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in that said defendant did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, A. S. A. (AZA. A.), to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

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COUNT 10

On or about and between May 1, 2015 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in that said defendant did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, A. W. A., to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

It is further alleged, pursuant to Penal Code Sections 1170(h)(3), 1170(f) and 1385, that the defendant is not eligible to be sentenced to a term of imprisonment in the county jail on an executed sentence due to a prior or current felony conviction for a serious felony described in subdivision (c) of Penal Code Section 1192.7, or a prior or current conviction for a violent felony described in subdivision (c) of Penal Code Section 667.5, or a prior felony conviction in another jurisdiction for an offense that has all of the elements of a serious felony described in subdivision (c) of Penal Code Section 1192.7, or a violent felony described in subdivision (c) of Penal Code Section 667.5, or because the defendant is required to register as a sex offender pursuant to Penal Code Section 290, or because the defendant is convicted of a crime and as part of the sentence an enhancement pursuant to Penal Code Section 186.11 is imposed.

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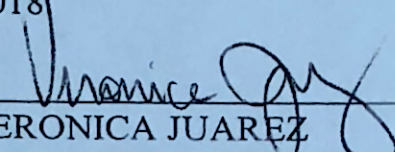
It is further alleged that the defendant INA ROGERS did commit acts which aggravate the above crime(s) pursuant to Rules 4.408 and 4.421 of the California Rules of Court.

DISCOVERY REQUEST PURSUANT TO PENAL CODE SECTION 1054/1054.7:

Pursuant to Penal Code sections 1054 through 1054.7, the People request that, within fifteen (15) days, the defendant and/or his/her attorney disclose: (a) The names and addresses of persons, other than the defendant, he/she intends to call as witnesses at trial, together with any relevant written or recorded statements of experts made in connection with the case, and including the results of physical or mental examinations, scientific tests, experiments, or comparisons which the defendant intends to offer in evidence at the trial. This request is a continuing request, to cover not only all such material currently in existence, but also all material which comes into existence to the conclusion of this case.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 10 COUNTS.

Executed at Fairfield, California, on May 14, 2018



VERONICA JUAREZ
DECLARANT AND COMPLAINANT

AGENCY: FAIRFIELD POLICE
DEPARTMENT

D.A. NO.: F181474

Arresting Officer: ANDERSON, Badge # 1593

DEFENDANT	CII NO	DOB	BOOKING NO	CUSTODY R'TN DATE
Ina Rogers	A29116194	04/22/1987	18-03880	07/16/2018

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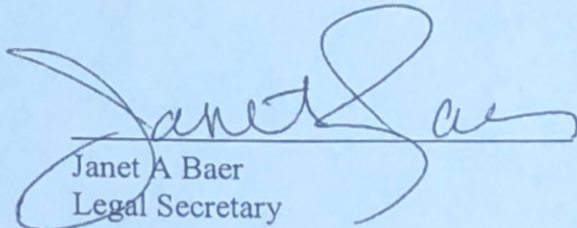
PROOF OF SERVICE

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On May 15, 2018 , I served the attached: **NOTICE OF MOTION TO AMEND COMPLAINT** in *People v. INA ROGERS*, docket # *FCR336784*, on the defense attorney(s) by:

Hand delivering a copy thereof to the Public Defender.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of May, 2018 at Fairfield, California.


Janet A Baer
Legal Secretary