

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

THE PEOPLE OF THE STATE OF CALIFORNIA,  <p style="text-align: center;">v.</p> JOHN PETER COLLINS, <i>dob 02/19/54;</i>	Plaintiff,   Defendant
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CT No. CD273020  
DA No. AEF415

COMPLAINT-FELONY

INFORMATION   Date: _____
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**PC296 DNA TEST STATUS SUMMARY**

<b>Defendant</b>	<b>DNA Testing Requirements</b>
COLLINS, JOHN PETER	DNA sample required upon conviction

**CHARGE SUMMARY**

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
1	PC424(a)1 COLLINS, JOHN PETER	Felony	2-3-4/\$10,000		
2	PC424(a)1 COLLINS, JOHN PETER	Felony	2-3-4/\$10,000		
3	PC424(a)1 COLLINS, JOHN PETER	Felony	2-3-4/\$10,000		
4	PC424(a)2 COLLINS, JOHN PETER	Felony	2-3-4/\$10,000		
5	PC115(a) COLLINS, JOHN PETER	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 - PUBLIC MONEYS - MISAPPROPRIATION**

On or about and between January 12, 2012 and April 1, 2016, JOHN PETER COLLINS, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, specifically vacation time, and to the use of another, in violation of PENAL CODE SECTION 424(a)1.

### **COUNT 2 - PUBLIC MONEYS - MISAPPROPRIATION**

On or about and between January 12, 2012 and April 1, 2016, JOHN PETER COLLINS, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, specifically sick leave and to the use of another, in violation of PENAL CODE SECTION 424(a)1.

### **COUNT 3 - PUBLIC MONEYS - MISAPPROPRIATION**

On or about and between January 12, 2012 and April 1, 2016, JOHN PETER COLLINS, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, and without authority of law, appropriate the same and any portion thereof, to his own use, specifically excessive leave and to the use of another, in violation of PENAL CODE SECTION 424(a)1.

### **COUNT 4 - PUBLIC MONEYS - LOAN/PROFIT/MISUSE**

On or about and between January 12, 2012 and April 1, 2016, JOHN PETER COLLINS, being a person charged with the receipt, safekeeping, transfer, and disbursement of public moneys, did unlawfully, loan the same and any portion thereof, make a profit out of, and use the same for a purpose not authorized by law, specifically p-card use, in violation of PENAL CODE SECTION 424(a)2.

### **COUNT 5 - FILING FALSE INSTRUMENT**

On or about and between March 1, 2013 and April 1, 2016, JOHN PETER COLLINS did knowingly and unlawfully procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in the State of California, which instrument, if genuine, might be legally filed, registered and recorded under a law of the State of California or a law of the United States, in violation of PENAL CODE SECTION 115(a); to wit: Form 700.

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.

Sheriff's records indicate that as of the booking date one or more defendants have not yet provided a DNA sample to the DOJ database. Pursuant to Penal Code Section 296(e), the court shall order collection of DNA from the defendant(s) if advised by the prosecuting attorney that a sample is required but has not been provided by the defendant. Pursuant to Penal Code sections 296/296.1, if not already required from a past conviction, any defendants who have not done so will be required to provide a sample upon conviction of this felony offense.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER CD273020, CONSISTS OF 5 COUNTS.

Executed at City of San Diego, County of San Diego, State of California, on August 3, 2017.

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COMPLAINANT

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INFORMATION

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

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Date

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Deputy District Attorney