

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SAN DIEGO**

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,  
  
v.  
  
BRIAN CORTEZ LIGHTFOOT JR.,  
*dob 09/30/96;*  
  
JEREMY JONATHAN WHITE,  
*dob 10/07/82;*  
  
Defendants

CT No. SCD274477  
DA No. AEX741  
3RD AMENDED  
INDICTMENT

**PC296 DNA TEST STATUS SUMMARY**

<b>Defendant</b>	<b>DNA Testing Requirements</b>
LIGHTFOOT, JR., BRIAN CORTEZ	DNA sample has been previously provided
WHITE, JEREMY JONATHAN	DNA sample has been previously provided

The Grand Jury of the County of San Diego, State of California, accuses the Defendant(s) of committing, in the County of San Diego, State of California, before the finding of this Indictment, the following crime(s):

**CHARGES**

**COUNT 1 - CONSPIRACY TO COMMIT A CRIME**

On or about January 9, 2021, coconspirator Alexander Akridgejacobs, coconspirator Jesse Merel Cannon, coconspirator Joseph Austin Gaskins, BRIAN CORTEZ LIGHFOOT JR., coconspirator Christian Martinez, coconspirator Luis Francisco Mora, coconspirator Samuel Howard Ogden, coconspirator Bryan Rivera, coconspirator Faraz Martin Talab, JEREMY JONATHAN WHITE, and coconspirator Erich Louis Yach (preferred name Nikki Hubbard), did unlawfully conspire together, with coconspirators and with another person and persons whose identity is unknown to commit the crime of Penal Code Section 404 Riot, in violation of PENAL CODE SECTION 182(a)(1).

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

Defendants are affiliated with Antifa. A group of the Defendants originated from the Los Angeles area and the remaining Defendants are from San Diego County. Antifa uses force, fear, and violence to further their interests and suppress the interests of others. The alleged objective of this conspiracy was to incite and participate in a riot as defined in Penal Code section 404 Riot.

## CHARGES (cont'd)

On or about January 2, 2021, Antifa supporters posted on social media calling for “counterprotesting” and direct action in response to a scheduled political demonstration in Pacific Beach on January 9, 2021. Defendants and other uncharged coconspirators confirmed their support and participation by showing up in Pacific Beach on January 9, 2021, dressed in black clothing, and armed with weapons and protective gear, before participating in the violence described below.

### INITIAL OVERT ACTS

OVERT ACT NO. (01): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. gathered black clothing, a tactical vest, goggles, a black mask, gloves, and armed himself with a tear gas weapon.

OVERT ACT NO. (02): On or about January 9, 2021, coconspirator Christian Martinez gathered black clothing, a black helmet, and armed himself with a tear gas weapon.

OVERT ACT NO. (03): On or about January 9, 2021, coconspirator Faraz Martin Talab gathered black clothing, and a face mask.

OVERT ACT NO. (04): On or about January 9, 2021, coconspirator Bryan Rivera gathered black clothing, a black helmet, goggles, and wrapped his wrist with pink boxing tape.

OVERT ACT NO. (05): On or about January 9, 2021, coconspirator Luis Francisco Mora gathered black clothing, a black mask, and armed himself with a tear gas weapon.

OVERT ACT NO. (06): On or about January 9, 2021, prior to arriving in Pacific Beach, coconspirator Luis Francisco Mora stopped at Big 5 Sporting Goods in Long Beach, California, and purchased an 8-ball brand skating helmet and goggles.

OVERT ACT NO. (07): On or about January 9, 2021, prior to arriving in Pacific Beach, coconspirator Faraz Martin Talab stopped at Big 5 Sporting Goods in Long Beach, California, and purchased four canisters of a tear gas weapon by brand “Sabre Running Gel.”

OVERT ACT NO. (08): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR., coconspirator Christian Martinez, coconspirator Luis Francisco Mora, coconspirator Faraz Martin Talab, and coconspirator Bryan Rivera discussed traveling to Pacific Beach.

OVERT ACT NO. (09): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR., coconspirator Christian Martinez, coconspirator Luis Francisco Mora, coconspirator Faraz Martin Talab, and coconspirator Bryan Rivera traveled from Los Angeles County and arrived in Pacific Beach as previously discussed.

OVERT ACT NO. (10): On or about January 9, 2021, JEREMY JONATHAN WHITE gathered black clothing, a gas mask, a tactical helmet, a tactical vest, gloves, and armed himself with a tear gas weapon.

OVERT ACT NO. (11): On or about January 9, 2021, JEREMY JONATHAN WHITE traveled to Pacific Beach.

OVERT ACT NO. (12): On or about January 9, 2021, coconspirator Jesse Merel Cannon gathered black clothing,

## CHARGES (cont'd)

gloves, and a mask.

OVERT ACT NO. (13): On or about January 9, 2021, coconspirator Alexander Akridgejacobs gathered a black long sleeve top, a shiny mask, and a black backpack.

OVERT ACT NO. (14): On or about January 9, 2021, coconspirator Erich Louis Yach (preferred name Nikki Hubbard) gathered black jeans, a black shirt with the sleeves cut off, a red flannel jacket with patches, and armed himself with a tear gas weapon.

OVERT ACT NO. (15): On or about January 9, 2021, coconspirator Joseph Austin Gaskins gathered black clothing, a gas mask, and a skateboard.

OVERT ACT NO. (16): On or about January 9, 2021, coconspirator Samuel Howard Ogden gathered black clothing, a tactical helmet, a black mask, and armed himself with a wooden walking stick.

OVERT ACT NO. (17): On or about January 9, 2021, coconspirator Jonah Bigel gathered black clothing, a mask, and armed himself with a baseball bat with the Twisted Tea logo.

### INCIDENT ONE

OVERT ACT NO. (18): On or about January 9, 2021, coconspirator Bryan Rivera photographed victim S.G., victim H.T., and victim A.F.

OVERT ACT NO. (19): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. initiated an attack by spraying victim S.G., victim H.T., victim A.F, and unidentified victim one with a tear gas weapon.

OVERT ACT NO. (20): On or about January 9, 2021, coconspirator Luis Francisco Mora sprayed unidentified victim one with a tear gas weapon.

OVERT ACT NO. (21): On or about January 9, 2021, coconspirator Christian Martinez sprayed unidentified victim one with a tear gas weapon.

OVERT ACT NO. (22): On or about January 9, 2021, coconspirator Alexander Akridgejacobs, coconspirator Jesse Merel Cannon, coconspirator Samuel Howard Ogden, coconspirator Bryan Rivera, coconspirator Nikki Hubbard, and other unidentified coconspirators chased and surrounded victim S.G.

OVERT ACT NO. (23): On or about January 9, 2021, coconspirator Alexander Akridgejacobs, coconspirator Jesse Merel Cannon, coconspirator Samuel Howard Ogden, coconspirator Bryan Rivera, coconspirator Erich Louis Yach (preferred name Nikki Hubbard), and other unidentified coconspirators participated in a group attack on victim S.G.

OVERT ACT NO. (24): On or about January 9, 2021, coconspirator Alexander Akridgejacobs, coconspirator Jesse Merel Cannon, coconspirator Luis Francisco Mora, coconspirator Samuel Howard Ogden, coconspirator Bryan Rivera, coconspirator Erich Louis Yach (preferred name Nikki Hubbard), and other unidentified coconspirators participated in a group attack on S.M (previously unidentified victim two.)

## CHARGES (cont'd)

OVERT ACT NO. (25): On or about January 9, 2021, coconspirator Alexander Akridgejacobs, coconspirator Luis Francisco Mora, coconspirator Bryan Rivera, coconspirator Faraz Martin Talab, coconspirator Erich Louis Yach (preferred name Nikki Hubbard), and other unidentified coconspirators participated in a group attack on victim E.H.

OVERT ACT NO. (26): On or about January 9, 2021, coconspirator Erich Louis Yach (preferred name Nikki Hubbard) kicked S.M. (previously unidentified victim two) while S.M. was on the ground.

OVERT ACT NO. (27): On or about January 9, 2021, coconspirator Bryan Rivera punched S.M. (previously unidentified victim two) while S.M. was on the ground.

OVERT ACT NO. (28): On or about January 9, 2021, coconspirator Erich Louis Yach (preferred name Nikki Hubbard) sprayed S.M. (previously unidentified victim two) with a tear gas weapon.

OVERT ACT NO. (29): On or about January 9, 2021, coconspirator Erich Louis Yach (preferred name Nikki Hubbard) sprayed victim E.H. with a tear gas weapon.

OVERT ACT NO. (30): On or about January 9, 2021, coconspirator Luis Francisco Mora sprayed victim E.H. with a tear gas weapon.

### INCIDENT TWO

OVERT ACT NO. (31): On or about January 9, 2021, coconspirator Luis Francisco Mora and other unidentified coconspirators confronted unidentified victim three as he walked his dog down the boardwalk.

OVERT ACT NO. (32): On or about January 9, 2021, JEREMY JONATHAN WHITE sprayed unidentified victim three and his dog with a tear gas weapon. INCIDENT THREE

OVERT ACT NO. (33): On or about January 9, 2021, coconspirator Faraz Martin Talab confronted victim J.C. for using his cell phone to film.

OVERT ACT NO. (34): On or about January 9, 2021, coconspirator Faraz Martin Talab slapped at victim J.C.'s phone.

OVERT ACT NO. (35): On or about January 9, 2021, coconspirator Faraz Martin Talab brandished a tear gas weapon at victim J.C.

OVERT ACT NO. (36): On or about January 9, 2021, coconspirator Faraz Martin Talab slapped victim J.C.'s phone out of his hand.

OVERT ACT NO. (37): On or about January 9, 2021, JEREMY JONATHAN WHITE confronted victim J.C.

OVERT ACT NO. (38): On or about January 9, 2021, coconspirator Faraz Martin Talab, coconspirator Lui Francisco Mora, JEREMY JONATHAN WHITE, coconspirator Erich Louis Yach (preferred name Nikki Hubbard), and other unidentified coconspirators surrounded victim J.C.

## CHARGES (cont'd)

OVERT ACT NO. (39): On or about January 9, 2021, an unidentified coconspirator slapped victim J.C.'s phone out of his hands.

OVERT ACT NO. (40): On or about January 9, 2021, coconspirator Luis Francisco Mora attempted to punch victim J.C.

OVERT ACT NO. (41): On or about January 9, 2021, an unidentified coconspirator sprayed victim J.C. with a tear gas weapon.

### INCIDENT FOUR

OVERT ACT NO. (42): On or about January 9, 2021, coconspirator Jesse Merel Cannon photographed victim M.A., victim T.G., N.S. (previously unidentified victim four), and R.S. (previously unidentified victim five.)

OVERT ACT NO. (43): On or about January 9, 2021, coconspirator Bryan Rivera photographed victim M.A., victim T.G., N.S. (previously unidentified victim four), and R.S. (previously unidentified victim five.)

OVERT ACT NO. (44): On or about January 9, coconspirator Jesse Merel Cannon pointed out victims M. A., T.G., N.S. (previously unidentified victim four), and R.S. (previously unidentified victim five) to the other coconspirators.

OVERT ACT NO. (45): On or about January 9, 2021, coconspirator Alexander Akridgejacobs, coconspirator Jesse Merel Canoon, BRIAN CORTEZ LIGHFOOT JR., coconspirator Luis Francisco Mora, coconspirator Samuel Howard Ogden, coconspirator Bryan Rivera, coconspirator Faraz Martin Talab, coconspirator Jonah Bigel, and other unidentified coconspirators surrounded victims M.A., T.G., N.S. (previously unidentified victim four), and R.S. (previously unidentified victim five.)

OVERT ACT NO. (46): On or about January 9, 2021, coconspirator Jesse Merel Cannon initiated an attack by yelling "Proud Boy Killa."

OVERT ACT NO. (47): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. sprayed victims M.A., T.G., N.S. (previously unidentified victim four), and R.S. (previously unidentified victim five) with a tear gas weapon.

OVERT ACT NO. (48): On or about January 9, 2021, an unidentified coconspirator sprayed victim T.G. in the face with a tear gas weapon.

OVERT ACT NO. (49): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. shoved victim T.G. in the back.

OVERT ACT NO. (50): On or about January 9, 2021, coconspirator Jesse Merel Cannon threw a wooden lawn chair at victim M.A.'s head and shoulders, striking victim M.A.

OVERT ACT NO. (51): On or about January 9, 2021, coconspirator Luis Francisco Mora sprayed victim M.A. in the face with a tear gas weapon.

OVERT ACT NO. (52): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. shoved victim M.A. to the

## CHARGES (cont'd)

ground.

OVERT ACT NO. (53): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. attempted to kick victim M.A. while she was on the ground.

OVERT ACT NO. (54): On or about January 9, 2021, an unidentified coconspirator struck victim M.A. with a flagpole.

OVERT ACT NO. (55): On or about January 9, 2021, coconspirator Samuel Howard Ogden brandished a walking stick at victim M.A.

OVERT ACT NO. (56): On or about January 9, 2021, an unidentified coconspirator threw a Twisted Tea can at victims T.G. and N.S. (previously unidentified victim four.)

OVERT ACT NO. (57): On or about January 9, 2021, an unidentified coconspirator threw a glass beer bottle at victims T.G. and N.S. (previously unidentified victim four.)

OVERT ACT NO. (58): On or about January 9, 2021, coconspirator Jesse Merel Cannon threw a glass beer bottle at N.S. (previously unidentified victim four.)

OVERT ACT NO. (59): On or about January 9, 2021, coconspirator Jonah Bigel struck victim T.G. with a baseball bat with the Twisted Tea logo.

OVERT ACT NO. (60): On or about January 9, 2021, coconspirator Alexander Akridgejacobs threw a can of Twisted Tea into unidentified N.S.'s (previously unidentified victim four) back.

OVERT ACT NO. (61): On or about January 9, 2021, coconspirator Jesse Merel Cannon threw a can of Twisted Tea toward victims M.A. and T.G.

OVERT ACT NO. (62): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. swung a closed fist toward N.S.'s (previously unidentified victim four) head.

OVERT ACT NO. (63): On or about January 9, 2021, an unidentified coconspirator threw several punches into N.S.'s (previously unidentified victim four) head.

OVERT ACT NO. (64): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. kicked N.S. (previously unidentified victim four.)

OVERT ACT NO. (65): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. kicked R.S. (previously unidentified victim five.)

OVERT ACT NO. (66): On or about January 9, 2021, after assaulting victims M.A., T.G., N.S. (previously unidentified victim four), and R.S. (previously unidentified victim five), BRIAN CORTEZ LIGHFOOT JR., coconspirator Bryan Rivera, and other unknown coconspirators chased victims M.A., T.G., N.S. (previously unidentified victim four), and R.S. (previously unidentified victim five) on foot.

## CHARGES (cont'd)

### INCIDENT FIVE

OVERT ACT NO. (67): On or about January 9, 2021, JEREMY JONATHAN WHITE pointed out victim R.L. to the other coconspirators.

OVERT ACT NO. (68): On or about January 9, 2021, coconspirator Jesse Merel Cannon shoved victim R.L. from his bicycle to the ground.

OVERT ACT NO. (69): On or about January 9, 2021, coconspirator Jesse Merel Cannon, coconspirator Faraz Martin Talab, coconspirator Samuel Howard Ogden, JEREMY JONATHAN WHITE, coconspirator Erich Louis Yach (preferred name Nikki Hubbard), and several unidentified coconspirators moved to surround victim R.L.

OVERT ACT NO. (70): On or about January 9, 2021, an unidentified coconspirator kicked victim R.L. while on the ground.

OVERT ACT NO. (71): On or about January 9, 2021, coconspirator Fadhil A. swung his skateboard at victim J.C.

OVERT ACT NO. (72): On or about January 9, 2021, coconspirator Erich Louis Yach (preferred name Nikki Hubbard) assaulted victim R.L. with a stun gun.

OVERT ACT NO. (73): On or about January 9, 2021, unidentified coconspirators vandalized victim R.L.'s bike.

OVERT ACT NO. (74): On or about January 9, 2021, coconspirator Erich Louis Yach (preferred name Nikki Hubbard) used a tear gas weapon against victims R.L. and J.C.

OVERT ACT NO. (75): On or about January 9, 2021, coconspirator Samuel Howard Ogden handed off his walking stick to BRIAN CORTEZ LIGHFOOT JR.

OVERT ACT NO. (76): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. struck victim J.C. across the back with the walking stick.

### INCIDENT SIX

OVERT ACT NO. (77): On or about January 9, 2021, coconspirator Alexander Akridgejacobs, coconspirator Jesse Merel Cannon, coconspirator Joseph Austin Gaskins, BRIAN CORTEZ LIGHFOOT, JR., coconspirator Christian Martinez, coconspirator Luis Francisco Mora, coconspirator Samuel Howard Ogden, coconspirator Bryan Rivera, coconspirator Faraz Martin Talab, JEREMY JONATHAN WHITE, coconspirator Erich Louis Yach (preferred name Nikki Hubbard), coconspirator Jonah Bigel, and/or one or more other unidentified coconspirators refused to disperse after the San Diego Police Department declared an unlawful assembly.

OVERT ACT NO. (78): On or about January 9, 2021, coconspirator Joseph Austin Gaskins threw objects at police

## CHARGES (cont'd)

officers.

OVERT ACT NO. (79): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. threw objects at police officers.

OVERT ACT NO. (80): On or about January 9, 2021, an unidentified coconspirator threw a glass beer bottle at police officers.

### INCIDENT SEVEN

OVERT ACT NO. (81): On or about January 9, 2021, coconspirator Alexander Akridgejacobs, BRIAN CORTEZ LIGHFOOT JR., coconspirator Luis Francisco Mora, coconspirator Christian Martinez, and other unidentified coconspirators moved to surround victim N.K.

OVERT ACT NO. (82): On or about January 9, 2021, an unidentified coconspirator used her umbrella to block victim N.K.'s escape and to obstruct observations of the attack.

OVERT ACT NO. (83): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR. sprayed victim N.K. with a tear gas weapon.

OVERT ACT NO. (84): On or about January 9, 2021, after the assault on victim N.K., coconspirator Alexander Akridgejacobs, BRIAN CORTEZ LIGHFOOT JR., coconspirator Christian Martinez, coconspirator Luis Francisco Mora, and other unidentified coconspirators chased victim N.K. up the street.

### INCIDENT EIGHT

OVERT ACT NO. (85): On or about January 9, 2021, JEREMY JONATHAN WHITE sprayed an unidentified victim eight with a tear gas weapon.

OVERT ACT NO. (86): On or about January 9, 2021, coconspirator Samuel Howard Ogden physically confronted a police officer who was attempting to make an arrest of an unidentified female coconspirator.

OVERT ACT NO. (87): On or about January 9, 2021, unidentified coconspirators grabbed an unidentified male coconspirator from police officers who were attempting to arrest the unidentified male coconspirator.

OVERT ACT NO. (88): On or about January 9, 2021, an unidentified coconspirator sprayed police officers with a teargas weapon.

89OVERT ACT NO. (89): On or about January 9, 2021, coconspirator Erich Louis Yach (preferred name Nikki Hubbard) and other unidentified conspirators surrounded the unidentified male coconspirator to conceal his identity and prevent his arrest.

OVERT ACT NO. (90): On or about January 9, 2021, unidentified conspirators provided a change of clothing to the unidentified male coconspirator.

OVERT ACT NO. (91): On or about January 9, 2021, the unidentified male coconspirator changed his clothing and

## CHARGES (cont'd)

successfully avoided arrest.

### INCIDENT NINE

OVERT ACT NO. (92): On or about January 9, 2021, coconspirator Jonah Bigel used a baseball bat with the Twisted Tea logo to vandalize the Skechers store front window.

### INCIDENT TEN

OVERT ACT NO. (93): On or about January 9, 2021, BRIAN CORTEZ LIGHFOOT JR., coconspirator Christian Martinez, coconspirator Faraz Martin Talab, and several other unidentified coconspirators surrounded unidentified victim six while he was on the ground.

OVERT ACT NO. (94): On or about January 9, 2021, an unidentified coconspirator kicked unidentified victim six in the ribs while he was on the ground.

OVERT ACT NO. (95): On or about January 9, 2021, coconspirator Faraz Martin Talab rushed forward and grabbed unidentified victim seven to prevent him from helping unidentified victim six who was on the ground.

OVERT ACT NO. (96): On or about January 9, 2021, coconspirator Faraz Martin Talab and unidentified coconspirators chased unidentified victim seven.

OVERT ACT NO. (97): On or about January 9, 2021, an unidentified coconspirator punched unidentified victim seven in the back of the head.

OVERT ACT NO. (98): On or about January 9, 2021, unidentified coconspirators threw unidentified victim seven to the ground.

OVERT ACT NO. (99): On or about January 9, 2021, coconspirator Joseph Austin Gaskins attempted to strike unidentified victim seven in the head with a skateboard while unidentified victim seven was on the ground.

OVERT ACT NO. (100): On or about January 9, 2021, coconspirator Christian Martinez threw a can of Twisted Tea at unidentified victim six while he was on the ground. INCIDENT ELEVEN

OVERT ACT NO. (101): On or about January 9, 2021, coconspirator Christian Martinez, coconspirator Faraz Martin Talab, coconspirator Luis Francisco Mora, and coconspirator Bryan Rivera confronted victim C.B.

OVERT ACT NO. (102): On or about January 9, 2021, coconspirator Faraz Martin Talab initiated a physical confrontation by swiping at victim C.B.

OVERT ACT NO. (103): On or about January 9, 2021, coconspirator Bryan Rivera grabbed victim C.B. and delivered a knee strike.

OVERT ACT NO. (104): On or about January 9, 2021, coconspirator Luis Francisco Mora struck victim C.B. in the face with his hand.

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

OVERT ACT NO. (105): On or about January 9, 2021, coconspirator Christian Martinez sprayed victim C.B. with a tear gas weapon.

### **COUNT 2 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN CORTEZ LIGHTFOOT JR. did unlawfully use tear gas and a tear gas weapon, on S.G., in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 3 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN CORTEZ LIGHTFOOT JR. did unlawfully use tear gas and a tear gas weapon, on H.T., in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 4 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN CORTEZ LIGHTFOOT JR. did unlawfully use tear gas and a tear gas weapon, on A.F., in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 5 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN CORTEZ LIGHTFOOT JR. did unlawfully use tear gas and a tear gas weapon, on unidentified victim one, in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 6 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN CORTEZ LIGHTFOOT JR. did unlawfully use tear gas and a tear gas weapon on M.A., in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 7 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN CORTEZ LIGHTFOOT JR. did unlawfully use tear gas and a tear gas weapon on T.G., in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 8 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN CORTEZ LIGHTFOOT JR. did unlawfully use tear gas and a tear gas weapon

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

on N.S. (previously unidentified victim four), in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 9 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN CORTEZ LIGHTFOOT JR. did unlawfully use tear gas and a tear gas weapon on R.S. (previously unidentified victim five), in violation of PENAL CODE SECTION 22810(g)(1).

### **COUNT 10 - ASSAULT BY MEANS LIKELY TO PRODUCE GREAT BODILY INJURY**

On or about January 9, 2021, coconspirator Alexander Akridgejacobs, Jesse Merel Cannon, BRIAN CORTEZ LIGHTFOOT JR., coconspirator Luis Francisco Mora, coconspirator Samuel Howard Ogden, coconspirator Bryan Rivera and coconspirator Faraz Martin Talab did unlawfully commit an assault upon M.A. by means of force likely to produce great bodily injury, in violation of PENAL CODE SECTION 245(a)(4).

### **COUNT 11 - ASSAULT BY MEANS LIKELY TO PRODUCE GREAT BODILY INJURY**

On or about January 9, 2021, coconspirator Alexander Akridgejacobs, coconspirator Jesse Merel Cannon, BRIAN CORTEZ LIGHTFOOT JR., coconspirator Samuel Howard Ogden, coconspirator Bryan Rivera and coconspirator Faraz Martin Talab did unlawfully commit an assault upon T.G. by means of force likely to produce great bodily injury, in violation of PENAL CODE SECTION 245(a)(4).

### **COUNT 12 - ASSAULT BY MEANS LIKELY TO PRODUCE GREAT BODILY INJURY**

On or about January 9, 2021, coconspirator Alexander Akridgejacobs, coconspirator Jesse Merel Cannon, BRIAN CORTEZ LIGHTFOOT JR., and coconspirator Bryan Rivera did unlawfully commit an assault upon N.S. (previously unidentified victim four) by means of force likely to produce great bodily injury, in violation of PENAL CODE SECTION 245(a)(4).

### **COUNT 13 - ASSAULT BY MEANS LIKELY TO PRODUCE GREAT BODILY INJURY**

On or about January 9, 2021, coconspirator Jesse Merel Cannon, BRIAN CORTEZ LIGHTFOOT JR., coconspirator Faraz Martin Talab, JEREMY JONATHAN WHITE, and coconspirator Erich Louis Yach (preferred name Nikki Hubbard) did unlawfully commit an assault upon R.L. by means of force likely to produce great bodily injury, in violation of PENAL CODE SECTION 245(a)(4).

**CHARGES (cont'd)**

**COUNT 14 - ASSAULT WITH DEADLY WEAPON**

On or about January 9, 2021, BRIAN CORTEZ LIGHTFOOT JR. and coconspirators Samuel Howard Ogden did unlawfully commit an assault upon J.C. with a deadly weapon and instrument, in violation of PENAL CODE SECTION 245(a)(1).

And it is further alleged that in the commission and attempted commission of the above offense, the said defendant, BRIAN CORTEZ LIGHTFOOT JR., personally used a dangerous and deadly weapon, to wit: a stick, within the meaning of PENAL CODE SECTION 1192.7(c)(23).

**COUNT 15 - USE OF TEAR GAS, NOT IN SELF-DEFENSE**

On or about January 9, 2021, BRIAN CORTEZ LIGHTFOOT JR. did unlawfully use tear gas and a tear gas weapon on N.K., in violation of PENAL CODE SECTION 22810(g)(1).

**COUNT 16 - ASSAULT BY MEANS LIKELY TO PRODUCE GREAT BODILY INJURY**

On or about January 9, 2021, BRIAN CORTEZ LIGHTFOOT JR., coconspirator Christian Martinez, and coconspirator Faraz Martin Talab did unlawfully commit an assault upon unidentified victim six by means of force likely to produce great bodily injury, in violation of PENAL CODE SECTION 245(a)(4).



THIS INDICTMENT, NUMBERED SCD274477, CONSISTS OF 16 COUNTS.

**"A TRUE BILL"**

**Summer Stephan**

District Attorney, County of San Diego, State of California

\_\_\_\_\_  
Foreman of the Grand Jury

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

DATE: \_\_\_\_\_

DATE: \_\_\_\_\_