

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
SAN BERNARDINO JUSTICE CENTER DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)	
)	
Plaintiff)	
)	
vs.)	FELONY COMPLAINT
)	
Joseph Michael Nardella)	
aka Joseph Nardella)	
)	DA CASE NO 2022-00-0019923
)	
Defendant)	
)	
)	
)	

The undersigned is informed and believes that:

COUNT 1

On or about January 31, 2015 through January 30, 2017, in the above-named judicial district, the crime of CONTINUOUS SEXUAL ABUSE, in violation of PENAL CODE SECTION 288.5(a), a felony, was committed by Joseph Michael Nardella, who did unlawfully engage in three and more acts of substantial sexual conduct, as defined in Penal Code Section 1203.066(b), and three and more lewd and lascivious acts, as defined in Penal Code Section 288, with John Doe, a child under the age of 14 years, while the defendant resided with, and had recurring access to, the child.

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).

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

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: 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 1524.1 and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order.

COUNT 2

On or about January 31, 2017 through January 30, 2018, in the above-named judicial district, the crime of SODOMY OF PERSON UNDER 16, in violation of PENAL CODE SECTION 286(b)(2), a felony, was committed by Joseph Michael Nardella, who did unlawfully, being over the age of twenty-one years, participate in an act of sodomy with John Doe, person under the age of sixteen years.

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: 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 1524.1 and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order.

COUNT 3

On or about January 31, 2018 through January 30, 2019, in the above-named judicial district, the crime of SODOMY OF PERSON UNDER 16, in violation of PENAL CODE SECTION 286(b)(2), a felony, was committed by Joseph Michael Nardella, who did unlawfully, being over the age of twenty-one years, participate in an act of sodomy with John Doe, person under the age of sixteen years.

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: 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 1524.1 and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order.

COUNT 4

On or about January 31, 2019 through January 30, 2020, in the above-named judicial district, the crime of SODOMY OF PERSON UNDER 18, in violation of PENAL CODE SECTION 286(b)(1), a felony, was committed by Joseph Michael Nardella, who did unlawfully participate in an act of sodomy with John Doe, a person under the age of eighteen years.

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: 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 1524.1 and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order.

COUNT 5

On or about January 31, 2020 through January 30, 2021, in the above-named judicial district, the crime of SODOMY OF PERSON UNDER 18, in violation of PENAL CODE SECTION 286(b)(1), a felony, was committed by Joseph Michael Nardella, who did unlawfully participate in an act of sodomy with John Doe, a person under the age of eighteen years.

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: 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 1524.1 and Health and Safety Code section 121055 following a probable cause hearing resulting in a court order.

* * * * *

It is further alleged as to each count, pursuant to Penal Code section 1170, subdivision (b)(2), that the following circumstances may apply in this case:

1. The victim was particularly vulnerable;
2. The defendant induced others to participate in the commission of the crime or occupied a position of leadership or dominance of other participants in its commission;
3. The defendant induced a minor to commit or assist in the commission of the crime;
4. The defendant took advantage of a position of trust or confidence to commit the offense.
5. And any other aggravating factors that may be permitted by law.

* * * * *

NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 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.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 5 COUNT(S).

Executed at San Bernardino, California, on June 22, 2022

Melissa Monrreal
Melissa Monrreal
DECLARANT AND COMPLAINANT

Agency: SB Sheriff CAC Division

Prelim Est.

Defendant

Joseph Michael Nardella

Birth Date

1969-02-02

Booking No

CII No.

A38551062

NCIC