

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)	
)	
Plaintiff)	
)	
vs.)	FELONY COMPLAINT
)	
Christopher Allen Phelps)	
aka Christopher Phelps)	
Kimberly Phelps)	DA CASE NO 2023-00-0009022
)	
)	
Defendant)	
)	
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)	
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)	

The undersigned is informed and believes that:

COUNT 1

On or about July 17, 2020 through July 17, 2020, in the above-named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(1), a felony, was committed by Christopher Allen Phelps, who did aid, abet, solicit, conspire with another and did knowingly present and cause to be presented a false and fraudulent claim for the payment of a loss and injury, including payment of a loss under a contract of insurance, to wit: American Automobile Association claim#014319196.

COUNT 2

On or about July 17, 2020, in the above-named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(3), a felony, was committed by Christopher Allen Phelps, who did aid, abet, solicit, conspire with another and did knowingly cause and participate in a vehicular collision, and other vehicular accident, for the purpose of presenting a false and fraudulent claim.

COUNT 3

On or about July 17, 2020, in the above-named judicial district, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Christopher Allen Phelps, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, Jane/John Doe, 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 4

On or about July 17, 2020, in the above-named judicial district, the crime of ASSAULT WITH A DEADLY WEAPON, in violation of PENAL CODE SECTION 245(a)(1), a felony, was committed by Christopher Allen Phelps, who did willfully and unlawfully commit an assault upon Kaela-Danyelle Bush with a deadly weapon, to wit, Motor Vehicle.

NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c).

COUNT 5

On or about January 21, 2021, in the above-named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(3), a felony, was committed by Christopher Allen Phelps, who did aid, abet, solicit, conspire with another and did knowingly cause and participate in a vehicular collision, and other vehicular accident, for the purpose of presenting a false and fraudulent claim.

COUNT 6

On or about January 21, 2021, in the above-named judicial district, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Christopher Allen Phelps, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, Jane/John Doe, 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 January 21, 2021, in the above-named judicial district, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Kimberly Phelps, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, Jane/John Doe, 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 January 21, 2021, in the above-named judicial district, the crime of ASSAULT WITH A DEADLY WEAPON, in violation of PENAL CODE SECTION 245(a)(1), a felony, was committed by Christopher Allen Phelps, who did willfully and unlawfully commit an assault upon Mark Stinson with a deadly weapon, to wit, Motor Vehicle.

NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c).

COUNT 9

On or about January 21, 2021, in the above-named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(1), a felony, was committed by Christopher Allen Phelps, who did aid, abet, solicit, conspire with another and did knowingly present and cause to be presented a false and fraudulent claim for the payment of a loss and injury, including payment of a loss under a contract of insurance, to wit: American Automobile Association claim#014535227

COUNT 10

On or about March 09, 2021, in the above-named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(3), a felony, was committed by Christopher Allen Phelps, who did aid, abet, solicit, conspire with another and did knowingly cause and participate

in a vehicular collision, and other vehicular accident, for the purpose of presenting a false and fraudulent claim.

COUNT 11

On or about March 09, 2021, in the above-named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(1), a felony, was committed by Christopher Allen Phelps, who did aid, abet, solicit, conspire with another and did knowingly present and cause to be presented a false and fraudulent claim for the payment of a loss and injury, including payment of a loss under a contract of insurance, to wit: American Automobile Association claim#014598391.

COUNT 12

On or about March 09, 2021, in the above-named judicial district, the crime of ASSAULT WITH A DEADLY WEAPON, in violation of PENAL CODE SECTION 245(a)(1), a felony, was committed by Christopher Allen Phelps, who did willfully and unlawfully commit an assault upon Christopher David Hinch with a deadly weapon, to wit, Motor Vehicle.

NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c).

COUNT 13

On or about March 09, 2021, in the above-named judicial district, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Christopher Allen Phelps, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, Jane/John Doe, 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 14

On or about November 21, 2021, in the above-named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(1), a felony, was committed by Christopher Allen Phelps and Kimberly Phelps, who did aid, abet, solicit, conspire with another and did knowingly present and cause to be presented a false and fraudulent claim for the payment

of a loss and injury, including payment of a loss under a contract of insurance, to wit: American Automobile Association claim#014976126 & Progressive claim# 0120217244117.

COUNT 15

On or about November 21, 2021, in the above-named judicial district, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Christopher Allen Phelps and Kimberly Phelps, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, Jane/John Doe, 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 16

On or about November 21, 2021, in the above-named judicial district, the crime of ASSAULT WITH A DEADLY WEAPON, in violation of PENAL CODE SECTION 245(a)(1), a felony, was committed by Christopher Allen Phelps, who did willfully and unlawfully commit an assault upon Mone Roberts and Chandler Scriven with a deadly weapon, to wit, Motor Vehicle.

NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c).

COUNT 17

On or about February 11, 2022, in the above-named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(1), a felony, was committed by Christopher Allen Phelps, who did aid, abet, solicit, conspire with another and did knowingly present and cause to be presented a false and fraudulent claim for the payment of a loss and injury, including payment of a loss under a contract of insurance, to wit: American Automobile Association claim#015103718.

COUNT 18

On or about February 11, 2022, in the above-named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(3), a felony, was committed by Christopher Allen Phelps, who did aid, abet, solicit, conspire with another and did knowingly cause and participate

in a vehicular collision, and other vehicular accident, for the purpose of presenting a false and fraudulent claim.

COUNT 19

On or about February 11, 2022, in the above-named judicial district, the crime of ASSAULT WITH A DEADLY WEAPON, in violation of PENAL CODE SECTION 245(a)(1), a felony, was committed by Christopher Allen Phelps, who did willfully and unlawfully commit an assault upon Cole Bierma and Stephen Bierma with a deadly weapon, to wit, Motor Vehicle.

NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c).

COUNT 20

On or about February 11, 2022, in the above-named judicial district, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Christopher Allen Phelps, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, Jane/John Doe, 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 21

On or about February 23, 2022, in the above-named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(1), a felony, was committed by Christopher Allen Phelps, who did aid, abet, solicit, conspire with another and did knowingly present and cause to be presented a false and fraudulent claim for the payment of a loss and injury, including payment of a loss under a contract of insurance, to wit: American Automobile Association claim#015103718.

COUNT 22

On or about February 23, 2022, in the above-named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(3), a felony, was committed by Christopher Allen Phelps, who did aid, abet, solicit, conspire with another and did knowingly cause and participate

in a vehicular collision, and other vehicular accident, for the purpose of presenting a false and fraudulent claim.

COUNT 23

On or about February 23, 2022, in the above-named judicial district, the crime of ASSAULT WITH A DEADLY WEAPON, in violation of PENAL CODE SECTION 245(a)(1), a felony, was committed by Christopher Allen Phelps, who did willfully and unlawfully commit an assault upon Scott Flowers with a deadly weapon, to wit, Motor Vehicle.

NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c).

* * * * *

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 crime involved great violence, great bodily harm, threat of great bodily harm, or other acts disclosing a high degree of cruelty, viciousness, or callousness;
2. The defendant was armed with or used a weapon at the time of the commission of the crime;
3. The victim was particularly vulnerable;
4. 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;
5. The defendant induced a minor to commit or assist in the commission of the crime;
6. The defendant threatened witnesses, unlawfully prevented or dissuaded witnesses from testifying, suborned perjury, or in any other way illegally interfered with the judicial process;
7. The defendant was convicted of other crimes for which consecutive sentences could have been imposed but for which concurrent sentences are being imposed;
8. The manner in which the crime was carried out indicates planning, sophistication, or professionalism;
9. The crime involved an attempted or actual taking or damage of great monetary value;
10. The crime involved a large quantity of contraband;
11. The defendant took advantage of a position of trust or confidence to commit the offense.
12. The crime constitutes a hate crime under section 422.55;
13. The defendant has engaged in violent conduct that indicates a serious danger to society;
14. The defendant's prior convictions as an adult or sustained petitions in juvenile delinquency proceedings are numerous or of increasing seriousness;

- 15. The defendant has served a prior term in prison or county jail under section 1170(h);
- 16. The defendant was on probation, mandatory supervision, postrelease community supervision, or parole when the crime was committed; and
- 17. The defendant's prior performance on probation, mandatory supervision, postrelease community supervision, or parole was unsatisfactory; and
- 18. 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 23 COUNT(S).

Executed at San Bernardino, California, on March 21, 2023

Denise Yoakum

 Denise Yoakum
 DECLARANT AND COMPLAINANT

Agency: Dept of Insurance Fraud - Rancho

Prelim Est.

Defendant	Birth Date	Booking No	CII No.	NCIC
Christopher Allen Phelps	1982-04-13		NONE	
Kimberly Phelps	1982-11-19			