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SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE, HARBOR JUSTICE CENTER
NEWPORT BEACH FACILITY

BY _____ DEPUTY

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4	THE PEOPLE OF THE STATE OF CALIFORNIA,)	COMPLAINT	
5)		
6	Plaintiff,)		
7)		
8	vs.)	No.	
9)	NBPD	
10	12/18/85)	BAC .27 BL COLLISION	
11)		
	Defendant(s))		

The Orange County District Attorney charges that in Orange County, California, the law was violated as follows:

COUNT 1: On or about November 01, 2008, in violation of Section 23152(a) of the Vehicle Code (DRIVING UNDER THE INFLUENCE OF ALCOHOL/DRUGS WITH ONE PRIOR), a MISDEMEANOR, HUGGINS did unlawfully drive a vehicle while under the influence of an alcoholic beverage, a drug(s) and under the combined influence of alcoholic beverage and drug(s), and pursuant to Vehicle Code section 23540, the defendant,)
, within ten (10) years of the commission of the above offense, committed a separate violation of Vehicle Code Section 23103 as specified in section 23103.5, Vehicle Code section 23152, and Vehicle Code section 23153, for which the defendant was convicted.

COUNT 2: On or about November 01, 2008, in violation of Section 23152(b) of the Vehicle Code (DRIVING WITH BLOOD ALCOHOL .08% OR MORE WITH ONE PRIOR), a MISDEMEANOR,) did unlawfully drive a vehicle while defendant's blood alcohol concentration was 0.08 percent (%) or more by weight of alcohol in defendant's blood, and pursuant to Vehicle Code section 23540, the defendant, within ten (10) years of the commission of the above offense, committed a separate violation of Vehicle Code Section 23103 as specified in section 23103.5, Vehicle Code section 23152, and Vehicle Code section 23153, for which the defendant was convicted.

1 COUNT 3: On or about November 01, 2008, in violation of Section
2 12500(a) of the Vehicle Code (DRIVE MOTOR VEHICLE WITHOUT A
3 VALID LICENSE), a MISDEMEANOR, did
4 unlawfully drive a motor vehicle upon a highway without then
5 holding a valid driver's license issued under the Vehicle Code.

6 OTHER ALLEGATION(S)

7 As to Count(s) 1 and 2, it is further alleged pursuant to
8 Section 23538(b)(2) of the Vehicle Code (BLOOD ALCOHOL .20
9 PERCENT) that defendant ; had a blood
10 alcohol concentration of .20 percent and more, by weight.

11 PRIOR CONVICTION(S)

12 As to Count(s) 1 and 2, it is further alleged, on or about July
13 14, 2004, S violated Section 23152(b) of
14 the Vehicle Code, resulting in a conviction on or about
15 September 09, 2004 in the SUPERIOR (PALM SPRINGS) Court of the
16 State of California, in and for the County of SACRAMENTO, case
17 number:

18 I declare under penalty of perjury, on information and belief,
19 that the foregoing is true and correct.

20 Dated 12/15/08 at Orange County, California.

21 VW/BA

22 TONY RACKAUCKAS, DISTRICT ATTORNEY

23 by _____ Deputy
24 Complainant

25 RESTITUTION CLAIMED

- 26 [] None
- 27 [] \$ _____
- 28 [X] To be determined

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NOTICES:

The People request that defendant and counsel disclose, within 15 days, all of the materials and information described in Penal Code section 1054.3, and continue to provide any later-acquired materials and information subject to disclosure, and without further request or order.