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SUPERIOR COURT OF THE STATE OF CALIFORNIA
CENTRAL JUSTICE CENTER, COUNTY OF ORANGE

THE PEOPLE OF THE STATE OF CALIFORNIA,)
)
) Plaintiff,)
)
) vs.)
)
) ANDY SUN) 1/17/56)
)
) Defendant(s))
)
) _____)

CASE NO.
INDICTMENT

THE GRAND JURY OF THE COUNTY OF ORANGE, STATE OF CALIFORNIA, BY THIS INDICTMENT, hereby accuses the aforementioned defendant of violating the law at and within the County of Orange as follows:

COUNT 1:

On or about March 26, 2004, in violation of Section 12280(a)(1) of the Penal Code (UNLAWFUL ASSAULT WEAPON ACTIVITY), a FELONY, ANDY SUN did unlawfully manufacture, cause to be manufactured, distribute, transport, import into the State of California, keep for sale, offer and expose for sale, give, and lend a OMEGA SPS-12.

COUNT 2:

On or about March 26, 2004, in violation of Section 12280(a)(1) of the Penal Code (UNLAWFUL ASSAULT WEAPON ACTIVITY), a FELONY, ANDY SUN did unlawfully manufacture, cause to be manufactured, distribute, transport, import into the State of California, keep for sale, offer and expose for sale, give, and lend a OMEGA SPS-12.

COUNT 3:

On or about March 26, 2004, in violation of Section 12280(a)(1) of the Penal Code (UNLAWFUL ASSAULT WEAPON ACTIVITY), a FELONY, ANDY SUN did unlawfully manufacture, cause to be manufactured, distribute, transport, import into the State of California, keep for sale, offer and expose for sale, give, and lend a OMEGA SPS-12.

1 **COUNT 4:**

2 On or about March 26, 2004, in violation of Section 12280(a)(1) of the Penal Code (UNLAWFUL
3 ASSAULT WEAPON ACTIVITY), a FELONY, ANDY SUN did unlawfully manufacture, cause to
4 be manufactured, distribute, transport, import into the State of California, keep for sale, offer and
5 expose for sale, give, and lend a OMEGA SPS-12.

6 **COUNT 5:**

7 On or about March 26, 2004, in violation of Section 12280(a)(1) of the Penal Code (UNLAWFUL
8 ASSAULT WEAPON ACTIVITY), a FELONY, ANDY SUN did unlawfully manufacture, cause to
9 be manufactured, distribute, transport, import into the State of California, keep for sale, offer and
10 expose for sale, give, and lend a OMEGA SPS-12.

11 **COUNT 6:**

12 On or about March 26, 2004, in violation of Section 12280(a)(1) of the Penal Code (UNLAWFUL
13 ASSAULT WEAPON ACTIVITY), a FELONY, ANDY SUN did unlawfully manufacture, cause to
14 be manufactured, distribute, transport, import into the State of California, keep for sale, offer and
15 expose for sale, give, and lend a OMEGA SPS-12.

16 **COUNT 7:**

17 On or about March 26, 2004, in violation of Section 12280(a)(1) of the Penal Code (UNLAWFUL
18 ASSAULT WEAPON ACTIVITY), a FELONY, ANDY SUN did unlawfully manufacture, cause to
19 be manufactured, distribute, transport, import into the State of California, keep for sale, offer and
20 expose for sale, give, and lend a OMEGA SPS-12.

21 **COUNT 8:**

22 On or about March 26, 2004, in violation of Section 12280(a)(1) of the Penal Code (UNLAWFUL
23 ASSAULT WEAPON ACTIVITY), a FELONY, ANDY SUN did unlawfully manufacture, cause to
24 be manufactured, distribute, transport, import into the State of California, keep for sale, offer and
25 expose for sale, give, and lend a OMEGA SPS-12.

26 **COUNT 9:**

27 On or about March 26, 2004, in violation of Section 12280(a)(1) of the Penal Code (UNLAWFUL
28 ASSAULT WEAPON ACTIVITY), a FELONY, ANDY SUN did unlawfully manufacture, cause to
be manufactured, distribute, transport, import into the State of California, keep for sale, offer and
expose for sale, give, and lend a OMEGA SPS-12.

29 **COUNT 10:**

30 On or about March 26, 2004, in violation of Section 12280(a)(1) of the Penal Code (UNLAWFUL
31 ASSAULT WEAPON ACTIVITY), a FELONY, ANDY SUN did unlawfully manufacture, cause to be
32 manufactured, distribute, transport, import into the State of California, keep for sale, offer and expose for
33 sale, give, and lend a OMEGA SPS-12.

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1 **COUNT 11:**

2 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
3 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to wit:
4 OMEGA SPS12.

4 **COUNT 12:**

5 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
6 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
7 wit: NORINCO MAK-90

7 **COUNT 13:**

8 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
9 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
10 wit: OMEGA SPS-12.

10 **COUNT 14:**

11 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
12 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
13 wit: NORINCO MAK-90.

13 **COUNT 15:**

14 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
15 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
16 wit: NORINCO MAK-90

16 **COUNT 16:**

17 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
18 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
19 wit: HK MODEL SP89.

19 **COUNT 17:**

20 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
21 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
22 wit: BULGARIAN SLR-100H.

22 **COUNT 18:**

23 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
24 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
25 wit: ROMANIAN AK.

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1 **COUNT 19:**

2 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
3 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
4 wit: NORINCO MAK-90.

4 **COUNT 20:**

5 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
6 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
7 wit: DPMS ARMS MODEL A-15.

7 **COUNT 21:**

8 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
9 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
10 wit: COLT SPORTER.

10 **COUNT 22:**

11 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
12 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
13 wit: OMEGA SPS-12.

13 **COUNT 23:**

14 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
15 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
16 wit: OMEGA SPS-12.

16 **COUNT 24:**

17 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
18 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
19 wit: OMEGA SPS-12.

19 **COUNT 25:**

20 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
21 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
22 wit: OMEGA SPS-12.

22 **COUNT 26:**

23 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
24 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
25 wit:ROMANIAN MODEL MAK-3.

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1 **COUNT 27:**

2 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
3 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
4 wit: ROMANIAN MODEL MAK-2.

4 **COUNT 28:**

5 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
6 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
7 wit: MAADI AK-47.

7 **COUNT 29:**

8 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
9 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
10 wit: NORINCO MODEL NHM-91.

10 **COUNT 30:**

11 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
12 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
13 wit: NORINCO MODEL 320 "UZI".

13 **COUNT 31:**

14 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
15 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
16 wit: ARSENAL MODEL SA93.

16 **COUNT 32:**

17 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
18 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
19 wit: YUGOLAVIAN MODEL M-90.

19 **COUNT 33:**

20 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
21 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
22 wit: POLY TECH AK-47-S.

22 **COUNT 34:**

23 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
24 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
25 wit: NORINCO MODEL 56S.

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1 **COUNT 35:**

2 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
3 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
4 wit: MITCHELL ARMS MODEL M-90.

4 **COUNT 36:**

5 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
6 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
7 wit: NORINCO MAK-90

7 **COUNT 37:**

8 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
9 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
10 wit: HK SL8-1

10 **COUNT 38:**

11 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
12 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
13 wit: FEDERAL ORDNANCE MODEL M-14.

13 **COUNT 39:**

14 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
15 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
16 wit: THOMPSON AUTO ORDNANCE.

16 **COUNT 40:**

17 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
18 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
19 wit: NORINCO SKS.

19 **COUNT 41:**

20 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
21 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
22 wit: LIA1 SPORTER.

22 **COUNT 42:**

23 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
24 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
25 wit: NORINCO MODEL NHM 91.

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1 **COUNT 43:**

2 On or about March 26, 2004, in violation of Section 12280(b) of the Penal Code (POSSESSION OF
3 AN ASSAULT WEAPON), a FELONY ANDY SUN did unlawfully possess an assault weapon, to
wit: NORINCO MAK 90.

4 **COUNT 44:**

5 On or about March 26, 2004, in violation of Section 12020(a)(2) of the Penal Code (POSSESSION
6 OF LARGE-CAPACITY MAGAZINE), a FELONY ANDY SUN did unlawfully manufacture, cause
to be manufactured, import into the State of California, keep for sale, offer and expose for sale, give,
and lend a large-capacity magazine, as defined in Penal Code Section 12020(c)(25).

7 **COUNT 45:**

8 On or about March 26, 2004, in violation of Section 12020(a)(2) of the Penal Code (POSSESSION
9 OF LARGE-CAPACITY MAGAZINE), a FELONY ANDY SUN did unlawfully manufacture, cause
to be manufactured, import into the State of California, keep for sale, offer and expose for sale, give,
10 and lend a large-capacity magazine, as defined in Penal Code Section 12020(c)(25).

11 **COUNT 46:**

12 On or about March 26, 2004, in violation of Section 12020(a)(2) of the Penal Code (POSSESSION
13 OF LARGE-CAPACITY MAGAZINE), a FELONY ANDY SUN did unlawfully manufacture, cause
to be manufactured, import into the State of California, keep for sale, offer and expose for sale, give,
and lend a large-capacity magazine, as defined in Penal Code Section 12020(c)(25).

14 **COUNT 47:**

15 On or about March 26, 2004, in violation of Section 12020(a)(2) of the Penal Code (POSSESSION
16 OF LARGE-CAPACITY MAGAZINE), a FELONY ANDY SUN did unlawfully manufacture, cause
to be manufactured, import into the State of California, keep for sale, offer and expose for sale, give,
17 and lend a large-capacity magazine, as defined in Penal Code Section 12020(c)(25).

18 **COUNT 48:**

19 On or about March 26, 2004, in violation of Section 12020(a)(2) of the Penal Code (POSSESSION
20 OF LARGE-CAPACITY MAGAZINE), a FELONY ANDY SUN did unlawfully manufacture, cause
to be manufactured, import into the State of California, keep for sale, offer and expose for sale, give,
and lend a large-capacity magazine, as defined in Penal Code Section 12020(c)(25).

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27 **COUNT 49:**

28 On or about March 26, 2004, in violation of Section 12020(a)(2) of the Penal Code (POSSESSION
OF LARGE-CAPACITY MAGAZINE), a FELONY ANDY SUN did unlawfully manufacture, cause

1 to be manufactured, import into the State of California, keep for sale, offer and expose for sale, give,
2 and lend a large-capacity magazine, as defined in Penal Code Section 12020(c)(25).

3 **COUNT 50:**

4 On or about March 26, 2004, in violation of Section 12020(a)(2) of the Penal Code (POSSESSION
5 OF LARGE-CAPACITY MAGAZINE), a FELONY ANDY SUN did unlawfully manufacture, cause
6 to be manufactured, import into the State of California, keep for sale, offer and expose for sale, give,
7 and lend a large-capacity magazine, as defined in Penal Code Section 12020(c)(25).

8 **COUNT 51:**

9 On or about March 26, 2004, in violation of Section 12020(a)(2) of the Penal Code (POSSESSION
10 OF LARGE-CAPACITY MAGAZINE), a FELONY ANDY SUN did unlawfully manufacture, cause
11 to be manufactured, import into the State of California, keep for sale, offer and expose for sale, give,
12 and lend a large-capacity magazine, as defined in Penal Code Section 12020(c)(25).

13 **COUNT 52:**

14 On or about March 26, 2004, in violation of Section 12020(a)(2) of the Penal Code (POSSESSION
15 OF LARGE-CAPACITY MAGAZINE), a FELONY ANDY SUN did unlawfully manufacture, cause
16 to be manufactured, import into the State of California, keep for sale, offer and expose for sale, give,
17 and lend a large-capacity magazine, as defined in Penal Code Section 12020(c)(25).

18 **COUNT 53:**

19 On or about March 26, 2004, in violation of Section 12020(a)(2) of the Penal Code (POSSESSION
20 OF LARGE-CAPACITY MAGAZINE), a FELONY ANDY SUN did unlawfully manufacture, cause
21 to be manufactured, import into the State of California, keep for sale, offer and expose for sale, give,
22 and lend a large-capacity magazine, as defined in Penal Code Section 12020(c)(25).

23 **COUNT 54:**

24 On or about March 26, 2004, in violation of Section 273a(a) of the Penal Code (CHILD ABUSE
25 AND ENDANGERMENT), a FELONY, ANDY SUN, under circumstances and conditions likely to
26 produce great bodily harm and death, did willfully, unlawfully, and as a result of criminal negligence,
27 injure, cause, and permit BRIAN S., a child, to suffer and to be inflicted with unjustifiable physical pain
28 and mental suffering, and, having the care and custody of BRIAN S., did willfully and unlawfully injure,
cause, and permit the person and health of the child to be injured and the child to be placed in a
situation that endangered the health of the child.

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23 **COUNT 55:**

24 On or about March 26, 2004, in violation of Section 273a(a) of the Penal Code (CHILD ABUSE
25 AND ENDANGERMENT), a FELONY, ANDY SUN, under circumstances and conditions likely to
26 produce great bodily harm and death, did willfully, unlawfully, and as a result of criminal negligence,
27 injure, cause, and permit KEVIN S., a child, to suffer and to be inflicted with unjustifiable physical pain
28 and mental suffering, and, having the care and custody of KEVIN S., did willfully and unlawfully injure,
cause, and permit the person and health of the child to be injured and the child to be placed in a

1 situation that endangered the health of the child.

2 Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense
3 counsel provide discovery to the People as required by Penal Code Section 1054.3.

4 DATED:

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A TRUE BILL

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TOM STAPLE, Foreman, Grand Jury
County of Orange, State of California
for the year 2003-2004

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BY: _____
PAUL CHRISOPOULOS
Deputy District Attorney

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--- WITNESSES EXAMINED BEFORE THE GRAND JURY ---

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1. Eric Maher - Special Agent, Dept. of Justice

2. Jon Florez - Special Agent, Dept. of Justice

1 Presented by the Foreman of the Grand Jury of the County of Orange, State of California, for
2 the year 2003 - 2004, in the presence of the Grand Jury, to the Superior Court of the State of California,
3 in and for the County of Orange, and filed as a record of this court this day of May, 2004.

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5 ALAN SLATER, EXECUTIVE OFFICER
6 and Clerk of the Superior Court
7 of the State of California, in and
8 for the County of Orange

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10 BY: _____
11 DEPUTY CLERK

12
13 TONY RACKAUCKAS, DISTRICT ATTORNEY
14 of the County of Orange, State of California

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16 BY: _____
17 Paul Chrisopoulos,
18 Deputy District Attorney