

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA

PEOPLE OF THE STATE OF CALIFORNIA

NO. **22-CR-014657**

COMPLAINT

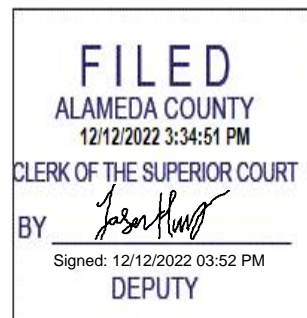
PFN:BJL055

CEN:2391989

v.

HOAN HONG TRUONG

Defendant(s)



The undersigned, being sworn says, on information and belief, that HOAN HONG TRUONG did, in the County of Alameda, on or about **December 06, 2022**, commit a MISDEMEANOR, to wit: BATTERY, a violation of section 242 of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully use force and violence upon the person of JANE DOE.

SECOND COUNT

The undersigned further deposes and says on information and belief, that said HOAN HONG TRUONG did, in the County of Alameda, on or about **December 06, 2022**, commit a MISDEMEANOR, to wit: CHILD MOLESTING, a violation of section 647.6(a)(1) of the PENAL CODE of California, in that said defendant(s) did unlawfully annoy and molest a child, JANE DOE 2, under the age of eighteen years.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Section 290 requires lifetime registration as a sex offender. Willful failure to register is a crime."

THIRD COUNT

The undersigned further deposes and says on information and belief, that said HOAN HONG TRUONG did, in the County of Alameda, on or about **December 06, 2022**, commit a MISDEMEANOR, to wit: RAZOR BLADE ON SCHOOL GROUNDS, a violation of section 626.10(a)(2) of the PENAL CODE of California, in that said defendant(s) did unlawfully bring and possess a razor blade and box cutter upon the grounds of, and within a public and private school providing instruction in kindergarten and grades 1 to 12.

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

Subscribed and sworn to before me,
Monday, December 12, 2022

This document was filed electronically in
compliance with Penal Code section 959.1

MONTAGUE HUNG
ATTORNEY
State Bar #322776
Alameda County, California

ALA 22-06951