

SUPERIOR COURT OF CALIFORNIA, COUNTY OF FRESNO
CRIMINAL DIVISION

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff

vs.

Abad Amilca Sandovalgonzalez

Tom Joel Avila

Defendant(s)

COMPLAINT – CRIMINAL

MISDEMEANOR COMPLAINT

COURT CASE NO. [M25908198](#)

SEARCH WARRANT NO.

DA FILE NO. 25-15797 M

Agency: Fresno Police Department

Agency Report Number: 2502260935

Defendant	Birth Date	JID	Booking No.
Sandovalgonzalez, Abad Amilca	03/24/1992		
Avila, Tom Joel	04/17/1971		

Personally appeared before me, who first being duly sworn, complains and alleges:

COUNT: 1

On or about February 26, 2025, in the above named judicial district, the crime of IMPERSONATING AN OFFICER, in violation of Penal Code Section 538d(a), a Misdemeanor, was committed by Abad Amilca Sandovalgonzalez and Tom Joel Avila, who did willfully and unlawfully wear, exhibit and use the authorized uniform, insignia, emblem, device, label, certificate, card and writing of a peace officer, with the intent of fraudulently impersonating a peace officer, and of fraudulently inducing the belief that defendants Abad Amilca Sandovalgonzalez and Tom Joel Avila was a peace officer.

All of which is contrary to the form, force, and effect of the Statute in such case made and provided, and against the peace and dignity of the people of the State of California.

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.

For the purpose of determining probable cause pursuant to Penal Code sections 991 and 991.5, the People hereby incorporate by reference Fresno Police Department report 2502260935.

Subscribed and sworn to before me on

DATE: 6/5/2025 10:08 AM

Attest:

/s/ Sila Kansaath

DEPUTY CLERK



A handwritten signature in black ink, appearing to be "W.G. [unclear]".

COMPLAINANT