

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF ORANGE, WEST JUSTICE CENTER
3

4 THE PEOPLE OF THE STATE OF CALIFORNIA,) COMPLAINT
5)
6 Plaintiff,)
7)
8 vs.) No. 09WM07097
9) WPD 09-06806
10 ANDY TUAN NGOC QUACH 03/14/72) BAC .26 BL COLLISION
11 A3268243)
12 AKA TUAN NGOC QUACH)
13 QUACH TUAN)
14 ANDY TUAN QUACH)
15 Defendant(s))

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

18 COUNT 1: On or about August 02, 2009, in violation of Section
19 23152(a) of the Vehicle Code (DRIVING UNDER THE INFLUENCE OF
20 ALCOHOL/DRUGS), a MISDEMEANOR, ANDY TUAN NGOC QUACH did
21 unlawfully drive a vehicle while under the influence of an
22 alcoholic beverage, a drug(s) and under the combined influence
23 of alcoholic beverage and drug(s).

24 COUNT 2: On or about August 02, 2009, in violation of Section
25 23152(b) of the Vehicle Code (DRIVING WITH BLOOD ALCOHOL .08% OR
26 MORE), a MISDEMEANOR, ANDY TUAN NGOC QUACH did unlawfully drive
27 a vehicle while defendant's blood alcohol concentration was 0.08
28 percent (%) or more by weight of alcohol in defendant's blood.

OTHER ALLEGATION(S)

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

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COMPLAINT SUPERSEDES CITATION NUMBER(s) WE 794463.

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

Dated 08/04/09 at Orange County, California.
MR/SP 09W05194

TONY RACKAUCKAS, DISTRICT ATTORNEY

by _____ Deputy
Complainant

RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

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.