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SSO-21-305298
M. EIXENBERGER, DDA
TEAM: (GANGS)

XRef: 5318668

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO**

THE PEOPLE OF THE STATE OF CALIFORNIA, FELONY COMPLAINT

vs.

NICHOLAS WAYNE SHERMAN,

Defendant.

The People of the State of California upon oath of the undersigned, upon information and belief complain against the defendant above named for the crime(s) as follows:

COUNT ONE

On or about October 20, 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS WAYNE SHERMAN, did commit a felony, namely: a violation of Section 11411(d) of the Penal Code of the State of California, in that said defendant desecrated a religious symbol, to wit: Shalom Le Israel Menorah, knowing it to be a religious symbol, on the private property of another without authorization, for the purpose to terrorizing the owner and occupant of private property or in reckless disregard of the risk of terrorizing the owner and occupant of that private property, to wit: 6733 Fair Oaks Blvd.



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4 **COUNT TWO**

5 For a further and separate cause of action, being a different offense from but connected in its
6 commission as the charges set forth in Count One hereof: On or about October 4, 2021, at and in
7 the County of Sacramento, State of California, the defendant, NICHOLAS WAYNE
8 SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of the Penal
9 Code of the State of California, in that said defendant placed or displayed a sign, mark, symbol,
10 emblem, or other physical impression, including, but not limited to, a Nazi swastika, on the
11 private property of another, without authorization, for the purpose of terrorizing the owner and
12 occupant of that private property or in reckless disregard of the risk of terrorizing the owner and
13 occupant of that private property, to wit: 6000 Stanley Avenue (Deterding Elementary).
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15 **COUNT THREE**

16 For a further and separate cause of action, being a different offense from but connected in its
17 commission as the charges set forth in Counts One and Two hereof: On or about October 4,
18 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS
19 WAYNE SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of
20 the Penal Code of the State of California, in that said defendant placed or displayed a sign, mark,
21 symbol, emblem, or other physical impression, including, but not limited to, a Nazi swastika, on
22 the private property of another, without authorization, for the purpose of terrorizing the owner
23 and occupant of that private property or in reckless disregard of the risk of terrorizing the owner
24 and occupant of that private property, to wit: 3243 California Avenue.
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26 **COUNT FOUR**

27 For a further and separate cause of action, being a different offense from but connected in its
28 commission as the charges set forth in Counts One through Three hereof: On or about October 4,
29 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS
30 WAYNE SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of
31 the Penal Code of the State of California, in that said defendant placed or displayed a sign, mark,
32 symbol, emblem, or other physical impression, including, but not limited to, a Nazi swastika, on
33 the private property of another, without authorization, for the purpose of terrorizing the owner
34 and occupant of that private property or in reckless disregard of the risk of terrorizing the owner
35 and occupant of that private property, to wit: 6209 Glademont Court.
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4 **COUNT FIVE**

5 For a further and separate cause of action, being a different offense from but connected in its
6 commission as the charges set forth in Counts One through Four hereof: On or about October 4,
7 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS
8 WAYNE SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of
9 the Penal Code of the State of California, in that said defendant placed or displayed a sign, mark,
10 symbol, emblem, or other physical impression, including, but not limited to, a Nazi swastika, on
11 the private property of another, without authorization, for the purpose of terrorizing the owner
12 and occupant of that private property or in reckless disregard of the risk of terrorizing the owner
13 and occupant of that private property, to wit: 6214 Glademont Court.
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15 **COUNT SIX**

16 For a further and separate cause of action, being a different offense from but connected in its
17 commission as the charges set forth in Counts One through Five hereof: On or about October 4,
18 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS
19 WAYNE SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of
20 the Penal Code of the State of California, in that said defendant placed or displayed a sign, mark,
21 symbol, emblem, or other physical impression, including, but not limited to, a Nazi swastika, on
22 the private property of another, without authorization, for the purpose of terrorizing the owner
23 and occupant of that private property or in reckless disregard of the risk of terrorizing the owner
24 and occupant of that private property, to wit: 6100 Palm Drive.
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26 **COUNT SEVEN**

27 For a further and separate cause of action, being a different offense from but connected in its
28 commission as the charges set forth in Counts One through Six hereof: On or about October 4,
29 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS
30 WAYNE SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of
31 the Penal Code of the State of California, in that said defendant placed or displayed a sign, mark,
32 symbol, emblem, or other physical impression, including, but not limited to, a Nazi swastika, on
33 the private property of another, without authorization, for the purpose of terrorizing the owner
34 and occupant of that private property or in reckless disregard of the risk of terrorizing the owner
35 and occupant of that private property, to wit: 3001 Panama Avenue.
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4 **COUNT EIGHT**

5 For a further and separate cause of action, being a different offense from but connected in its
6 commission as the charges set forth in Counts One through Seven hereof: On or about October 4,
7 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS
8 WAYNE SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of
9 the Penal Code of the State of California, in that said defendant placed or displayed a sign, mark,
10 symbol, emblem, or other physical impression, including, but not limited to, a Nazi swastika, on
11 the private property of another, without authorization, for the purpose of terrorizing the owner
12 and occupant of that private property or in reckless disregard of the risk of terrorizing the owner
13 and occupant of that private property, to wit: 6113 Mauer Avenue.

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15 **COUNT NINE**

16 For a further and separate cause of action, being a different offense from but connected in its
17 commission as the charges set forth in Counts One through Eight hereof: On or about October 4,
18 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS
19 WAYNE SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of
20 the Penal Code of the State of California, in that said defendant placed or displayed a sign, mark,
21 symbol, emblem, or other physical impression, including, but not limited to, a Nazi swastika, on
22 the private property of another, without authorization, for the purpose of terrorizing the owner
23 and occupant of that private property or in reckless disregard of the risk of terrorizing the owner
24 and occupant of that private property, to wit: 6007 Stanley Avenue.

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26 **COUNT TEN**

27 For a further and separate cause of action, being a different offense from but connected in its
28 commission as the charges set forth in Counts One through Nine hereof: On or about October 4,
29 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS
30 WAYNE SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of
31 the Penal Code of the State of California, in that said defendant placed or displayed a sign, mark,
32 symbol, emblem, or other physical impression, including, but not limited to, a Nazi swastika, on
33 the private property of another, without authorization, for the purpose of terrorizing the owner
34 and occupant of that private property or in reckless disregard of the risk of terrorizing the owner
35 and occupant of that private property, to wit: 6005 Leafwood Drive.

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4 **COUNT ELEVEN**

5 For a further and separate cause of action, being a different offense from but connected in its
6 commission as the charges set forth in Counts One through Ten hereof: On or about October 4,
7 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS
8 WAYNE SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of
9 the Penal Code of the State of California, in that said defendant placed or displayed a sign, mark,
10 symbol, emblem, or other physical impression, including, but not limited to, a Nazi swastika, on
11 the private property of another, without authorization, for the purpose of terrorizing the owner
12 and occupant of that private property or in reckless disregard of the risk of terrorizing the owner
13 and occupant of that private property, to wit: 3249 California Avenue.

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15 **COUNT TWELVE**

16 For a further and separate cause of action, being a different offense from but connected in its
17 commission as the charges set forth in Counts One through Eleven hereof: On or about October
18 4, 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS
19 WAYNE SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of
20 the Penal Code of the State of California, in that said defendant placed or displayed a sign, mark,
21 symbol, emblem, or other physical impression, including, but not limited to, a Nazi swastika, on
22 the private property of another, without authorization, for the purpose of terrorizing the owner
23 and occupant of that private property or in reckless disregard of the risk of terrorizing the owner
24 and occupant of that private property, to wit: 3311 California Avenue.

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26 **COUNT THIRTEEN**

27 For a further and separate cause of action, being a different offense from but connected in its
28 commission as the charges set forth in Counts One through Twelve hereof: On or about October
29 4, 2021, at and in the County of Sacramento, State of California, the defendant, NICHOLAS
30 WAYNE SHERMAN, did commit a misdemeanor, namely: a violation of Section 11411(b) of
31 the Penal Code of the State of California, in that said defendant placed or displayed a sign, mark,
32 symbol, emblem, or other physical impression, including, but not limited to, a Nazi swastika, on
33 the private property of another, without authorization, for the purpose of terrorizing the owner
34 and occupant of that private property or in reckless disregard of the risk of terrorizing the owner
35 and occupant of that private property, to wit: 3021 Panama Avenue.

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38 That attached hereto and by this reference incorporated herein is a declaration setting forth facts
39 in support of probable cause for the issuance of a warrant of arrest herein.



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

Executed at Sacramento County, California, the 17th day of December, 2021.



CASEY NEWTON
SACRAMENTO COUNTY DISTRICT ATTORNEY
(916) 874-6218
Telephone Number

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