

CASH BOND

RECOMMENDED:

DEF#1 NO BAIL In Custody: 1.21.2020

DEF#2 NO BAIL In Custody: 1.21.2020

MICHAEL A. HESTRIN
DISTRICT ATTORNEY

AGENCY#: 2001I2174/IPD

FILED
Superior Court of California
County of Riverside

01/21/2020

SONYA BECERRA-CASTELLON

SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE
(Indio)

INF2000098

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff, D.A.# 381013

v.

LEONARDO DANIEL ALVARADO FERNANDEZ

DOB: 12.27.1986

BOOKING#: 202002318

ZUE ITZAYANA FLORES URIAS

DOB: 11.29.1993

BOOKING#: 202002317

Defendants.

CASE NO.

FELONY COMPLAINT

COUNT 1

The undersigned, under penalty of perjury upon information and belief, declares: That the above named defendants LEONARDO DANIEL ALVARADO FERNANDEZ and ZUE ITZAYANA FLORES URIAS committed a violation of Penal Code section 187, subdivision (a), a felony, in that on or about 1/15/2020, in the County of Riverside, State of California, the defendants did willfully and unlawfully, with premeditation and deliberation, murder Marcos (3 months old), a human being.

It is further alleged that the murder of Marcos (3 months old) by the above defendant, LEONARDO DANIEL ALVARADO FERNANDEZ was intentional and involved the infliction of torture within the meaning of Penal Code section 190.2, subdivision (a)(18).

COUNT 2

That the above named defendants LEONARDO DANIEL ALVARADO FERNANDEZ and ZUE ITZAYANA FLORES URIAS committed a violation of Penal Code section 273ab, subdivision (a), a felony, in that on or about 1/15/2020, in the County of Riverside, State of California, the defendants, having the care and custody of Marcos (3 months old), a child under eight years of age, did willfully and unlawfully assault said child by means of force that to a reasonable person would be likely to produce great bodily injury, resulting in the death of said child.

COUNT 3

That the above named defendant LEONARDO DANIEL ALVARADO FERNANDEZ committed a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about December 2019 – January 15, 2020, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, Marcos (3 months old - eye injury), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did willfully cause and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such a situation that their person and health was endangered.

COUNT 4

That the above named defendant LEONARDO DANIEL ALVARADO FERNANDEZ committed a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about December 2019 – January 15, 2020, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, Marcos (3 months old – punching to side of body), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did willfully cause and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such a situation that their person and health was endangered.

COUNT 5

That the above named defendant LEONARDO DANIEL ALVARADO FERNANDEZ committed a violation of section 206 of the Penal Code, a felony, in that on or about December 2019 – January 15, 2020, in the County of Riverside, State of California, the defendant did willfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: Marcos (3 months old).

MARSY'S LAW

Information contained in the reports being distributed as discovery in this case may contain confidential information protected by Marsy's Law and the amendments to the California Constitution Section 28. Any victim(s) in any above referenced charge(s) is entitled to be free from intimidation, harassment, and abuse. It is unlawful for defendant(s), defense counsel, and any other person acting on behalf of the defendant(s) to use any information contained in the reports to locate or harass any victim(s) or the victim(s)'s family or to disclose any information that is otherwise privileged and confidential by law. Additionally, it is a misdemeanor violation of California Penal Code § 1054.2a(3) to disclose the address and telephone number of a victim or witness to a defendant, defendant's family member or anyone else. Note exceptions in California Penal Code § 1054.2a(a) and (2).

DISCOVERY REQUEST

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

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

Dated: January 21, 2020

Michael A. Hestrin
District Attorney

By: Samantha S. Paixao
Deputy District Attorney

bjc