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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF YOLO

10
11 THE PEOPLE OF THE STATE OF
CALIFORNIA,

12
13 Plaintiff,

14 vs.

15 STEVEN HENDRIX

16 Defendant

Dept. 1

Case No. 16001094

COMPLAINT

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18 I, the undersigned, say, on information and belief, that in
19 the County of Yolo, State of California:

20 Count 1 : On or about February 25, 2016, STEVEN HENDRIX did
21 commit a FELONY, namely, a violation of Section 187(a) of the
22 California Penal Code, MURDER, in that STEVEN HENDRIX did
23 willfully and unlawfully kill a human being, to wit, Cynthia
24 Jonasen, with malice aforethought [Watson Implied Malice Murder].

25 Count 2 : On or about February 25, 2016, STEVEN HENDRIX did
26 commit a FELONY, namely, a violation of Section 191.5(a) of the
27 California Penal Code, GROSS VEHICULAR MANSLAUGHTER WHILE
28 INTOXICATED, in that STEVEN HENDRIX did willfully and unlawfully

1 kill a human being, to wit, Cynthia Jonasen, without malice
2 aforethought, while driving a vehicle, and the driving was in
3 violation of Section 23152 or 23153 of the California Vehicle
4 Code, and the killing was either the proximate result of the
5 commission of an unlawful act, not amounting to a felony, and
6 with gross negligence, and the proximate result of a lawful act
7 which might produce death, in an unlawful manner, and with gross
8 negligence.

9 Count 3 : On or about February 25, 2016, STEVEN HENDRIX did
10 commit a FELONY, namely, a violation of Section 23153(e) of the
11 California Vehicle Code, DRIVING UNDER THE INFLUENCE OF DRUGS
12 CAUSING INJURY, in that STEVEN HENDRIX did willfully and
13 unlawfully drive a vehicle while under the influence of any
14 drug, and concurrently did any act forbidden by law and neglect
15 a duty imposed by law in driving the vehicle, which act or
16 neglect did proximately cause bodily injury to any person other
17 than STEVEN HENDRIX.

18 Count Enhancement 3a : It is further alleged that during
19 the commission of the felony charged in Count 3 STEVEN HENDRIX
20 did proximately cause Bodily injury to more than one victim, to
21 wit, Beshia Shoate-Peppars, Wyeshia Shoate, A.P. (D.O.B. 9-5-
22 2003), E.S. (D.O.B. 6-8-2003), J.P. (D.O.B. 9-3-2005), I.P.
23 (D.O.B. 5-4-2009), within the meaning of Section 23558 of the
24 California Vehicle Code, ENHANCEMENT FOR MULTIPLE VICTIMS WHEN
25 SECTION 23153 OF THE VEHICLE CODE OR SECTION 191.5 OR 193(c)(3)
26 OF THE PENAL CODE IS CHARGED.

27 Count 4 : On or about February 25, 2016, STEVEN HENDRIX did
28 commit a FELONY, namely, a violation of Section 273a(a) of the

1 California Penal Code, ABUSING OR ENDANGERING HEALTH OF A CHILD,
2 in that STEVEN HENDRIX did willfully and unlawfully, under
3 circumstances and conditions likely to produce great bodily harm
4 and death, cause and permit a child to suffer, and STEVEN
5 HENDRIX did inflict thereon unjustifiable physical pain and
6 mental suffering, and having the care or custody of said child
7 STEVEN HENDRIX did willfully cause and permit the person and
8 health of said child to be injured, and STEVEN HENDRIX did
9 willfully cause and permit said child to be placed in such a
10 situation that the child's person and health was endangered.

11 Count 5 : On or about February 25, 2016, STEVEN HENDRIX did
12 commit a FELONY, namely, a violation of Section 273a(a) of the
13 California Penal Code, ABUSING OR ENDANGERING HEALTH OF A CHILD,
14 in that STEVEN HENDRIX did willfully and unlawfully, under
15 circumstances and conditions likely to produce great bodily harm
16 and death, cause and permit a child to suffer, and STEVEN
17 HENDRIX did inflict thereon unjustifiable physical pain and
18 mental suffering, and having the care or custody of said child
19 STEVEN HENDRIX did willfully cause and permit the person and
20 health of said child to be injured, and STEVEN HENDRIX did
21 willfully cause and permit said child to be placed in such a
22 situation that the child's person and health was endangered.

23 Count 6 : On or about February 25, 2016, STEVEN HENDRIX did
24 commit a FELONY, namely, a violation of Section 273a(a) of the
25 California Penal Code, ABUSING OR ENDANGERING HEALTH OF A CHILD,
26 in that STEVEN HENDRIX did willfully and unlawfully, under
27 circumstances and conditions likely to produce great bodily harm
28 and death, cause and permit a child to suffer, and STEVEN

1 HENDRIX did inflict thereon unjustifiable physical pain and
2 mental suffering, and having the care or custody of said child
3 STEVEN HENDRIX did willfully cause and permit the person and
4 health of said child to be injured, and STEVEN HENDRIX did
5 willfully cause and permit said child to be placed in such a
6 situation that the child's person and health was endangered.

7 Count 7 : On or about February 24, 2016, STEVEN HENDRIX did
8 commit a FELONY, namely, a violation of Section 273a(a) of the
9 California Penal Code, ABUSING OR ENDANGERING HEALTH OF A CHILD,
10 in that STEVEN HENDRIX did willfully and unlawfully, under
11 circumstances and conditions likely to produce great bodily harm
12 and death, cause and permit a child to suffer, and STEVEN
13 HENDRIX did inflict thereon unjustifiable physical pain and
14 mental suffering, and having the care or custody of said child
15 STEVEN HENDRIX did willfully cause and permit the person and
16 health of said child to be injured, and STEVEN HENDRIX did
17 willfully cause and permit said child to be placed in such a
18 situation that the child's person and health was endangered.

19 Count 8 : On or about February 25, 2016, STEVEN HENDRIX did
20 commit a MISDEMEANOR, namely, a violation of Section 14601.1(a)
21 of the California Vehicle Code, DRIVING WHILE DRIVING PRIVILEGE
22 SUSPENDED OR REVOKED, in that STEVEN HENDRIX did willfully and
23 unlawfully drive a motor vehicle at any time when STEVEN
24 HENDRIX's driving privilege was suspended and revoked and STEVEN
25 HENDRIX knew of the suspension and revocation.

26 Case Enhancement a : It is further alleged that STEVEN
27 HENDRIX was previously convicted of a serious felony within the
28 meaning of Section 667(c) and 667(e)(1) of the California Penal

1 Code, ENHANCEMENT FOR ONE PRIOR FELONY CONVICTION THAT PROHIBITS
2 PROBATION, LIMITS CREDITS, REQUIRES CONSECUTIVE SENTENCING, AND
3 MANDATES PRISON COMMITMENT, in that STEVEN HENDRIX was convicted
4 of a prior felony as defined in Section 667(d) of the California
5 Penal Code, and listed in Sections 667.5(c) and 1192.7(a) of the
6 Penal Code, and Section 707(b) of the Welfare and Institutions
7 Code, to wit, a conviction on December 9th, 2011 for a
8 violation of Section 459 First Degree of the California Penal
9 Code, in the County of Sacramento.

10 Case Enhancement b : It is further alleged that STEVEN
11 HENDRIX was previously convicted of a serious felony within the
12 meaning of Section 667(a)(1) of the California Penal Code,
13 ENHANCEMENT FOR HABITUAL CRIMINALS, in that STEVEN HENDRIX was
14 convicted of a serious felony listed in Section 1192.7 of the
15 Penal Code, to wit, Section 459 First Degree of the California
16 Penal Code, on December 9th, 2011 in the County of
17 Sacramento[applies if Defendant is convicted in either Count One
18 or Count Two and 667(e)enhancement].

19 Case Enhancement c : It is further alleged that STEVEN
20 HENDRIX was previously convicted of a felony within the meaning
21 of Section 667.5(b) of the California Penal Code, ENHANCEMENT
22 FOR PRIOR PRISON TERM, in that STEVEN HENDRIX was convicted of a
23 felony on December 9th, 2011 in the County of Sacramento, and
24 that STEVEN HENDRIX served a prison term for such conviction and
25 that STEVEN HENDRIX has not remained free of prison custody or
26 free of a felony conviction for five years, within the meaning
27 of Section 667.5 of the Penal Code.

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1 Case Enhancement d : It is further alleged that at the time
2 of the commission of the offense(s) alleged in Count(s) 1
3 through 7 that the Defendant was out of custody on bail or on
4 his or her own recognizance within the meaning of Section
5 12022.1(b) of the California Penal Code, ENHANCEMENT FOR FELONY
6 COMMITTED WHILE RELEASED ON BAIL OR RECOGNIZANCE.

7 I declare under penalty of perjury that the foregoing is
8 correct.

9 Executed on February 26, 2016, at Woodland, California.

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13 Garrett Hamilton/173423
14 Supervising Deputy District Attorney
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