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

10  
11 THE PEOPLE OF THE STATE OF  
12 CALIFORNIA,

13 Plaintiff,

14 vs.

15 DAVID ASHLEY FROSTE,  
16 JONATHAN FROSTE,  
17 CHANDALE DONTRAY SHANNON JR  
18 Defendants

Dept. | Case No. 18003504  
COMPLAINT

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

22 Count 1 : On or about October 17th, 2016, CHANDALE DONTRAY  
23 SHANNON JR and DAVID ASHLEY FROSTE did commit a FELONY, namely, a  
24 violation of Section 187(a) of the California Penal Code,  
25 MURDER, in that CHANDALE DONTRAY SHANNON JR and DAVID ASHLEY  
26 FROSTE and JONATHAN FROSTE did willfully and unlawfully kill a  
27 human being, to wit, Enrique Rios, with malice aforethought.

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1           Count Enhancement 1a : It is further alleged that during  
2 the commission of the felony charged above CHANDALE DONTRAY  
3 SHANNON JR and DAVID ASHLEY FROSTE and,that a principal in said  
4 felony offense was armed with a firearm, within the meaning of  
5 Section 12022(a)(1) of the California Penal Code, ARMED WITH  
6 FIREARM.

7           Count 2 : On or about October 18, 2016, JONATHAN FROSTE did  
8 commit a FELONY, namely, a violation of Section 32 of the  
9 California Penal Code, ACCESSORY TO A FELONY, in that after the  
10 commission of a felony JONATHAN FROSTE did willfully and  
11 unlawfully harbor, conceal, and aid a principal in said felony,  
12 to wit MURDER of Enrique Rios, with the intent that said  
13 principal avoid or escape from arrest, trial, conviction and  
14 punishment after JONATHAN FROSTE had knowledge that said  
15 principal had committed MURDER.

16           Count 3 : On or about November 4th, 2016, DAVID ASHLEY  
17 FROSTE and JONATHAN FROSTE did commit a FELONY, namely, a  
18 violation of Section 207(a) of the California Penal Code,  
19 KIDNAPPING, in that DAVID ASHLEY FROSTE and JONATHAN FROSTE did  
20 willfully, unlawfully, forcibly, and by any other means of  
21 instilling fear steal, take, hold, detain, and arrest any  
22 person, to wit, Elijah Moore, in the State of California, and  
23 DAVID ASHLEY FROSTE and JONATHAN FROSTE did carry such victim  
24 into another part of the same county.

25           Case Enhancement 3a : It is further alleged that during the  
26 commission of the felony charged above, DAVID ASHLEY FROSTE did  
27 willfully, unlawfully, and personally use a deadly or dangerous  
28 weapon, within the meaning of Section 12022(b)(1) of the

1 California Penal Code, USE OF DEADLY WEAPON[knife or scissors].

2 Count 4 : On or about November 4th, 2016, CHANDALE DONTRAY  
3 SHANNON JR and DAVID ASHLEY FROSTE and JONATHAN FROSTE did  
4 commit a FELONY, namely, a violation of Section 187(a) of the  
5 California Penal Code, MURDER, in that CHANDALE DONTRAY SHANNON  
6 JR and DAVID ASHLEY FROSTE and JONATHAN FROSTE did willfully and  
7 unlawfully kill a human being, to wit, Elijah Moore, with  
8 malice aforethought.

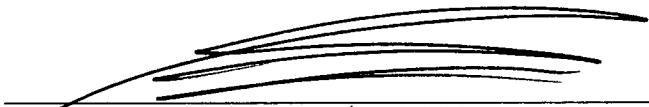
9 Count Enhancement 4a : It is further alleged that during  
10 the commission of the felony charged above CHANDALE DONTRAY  
11 SHANNON JR and DAVID ASHLEY FROSTE and JONATHAN FROSTE that a  
12 principal in said felony offense was armed with a firearm,  
13 within the meaning of Section 12022(a)(1) of the California  
14 Penal Code, ARMED WITH FIREARM.

15 Case Enhancement a : It is also alleged that during the  
16 commission of the murders as charged above in this complaint,  
17 CHANDALE DONTRAY SHANNON JR and DAVID ASHLEY FROSTE did murder  
18 another, to wit, Enrique Rios and Elijah Moore, within the  
19 meaning of Section 190.2(a)(3) of the California Penal Code,  
20 SPECIAL CIRCUMSTANCES FOR MULTIPLE MURDERS.

21 Case Enhancement b : It is also alleged that the murder as  
22 charged above was committed while DAVID ASHLEY FROSTE and  
23 JONATHAN FROSTE was engaged in or was an accomplice in the  
24 commission of, attempted commission of, and the immediate flight  
25 after committing a felony violation of Section 207 of the  
26 California Penal Code, Kidnapping, within the meaning of Section  
27 190.2(a)(17) of the California Penal Code, SPECIAL CIRCUMSTANCES  
28 FOR MURDER DURING THE COMMISSION OF KIDNAPPING.

1 I declare under penalty of perjury that the foregoing is  
2 correct.

3 Executed on June 11, 2018, at Woodland, California.

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6 Garrett Hamilton/173423  
7 Supervising Deputy District Attorney  
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