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FILED  
YOLO SUPERIOR COURT  
JAN 21 2020

BY     F. A      
DEPUTY

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 PAUL ALLEN PEREZ

16 Defendant(s)

Dept. 1

Case No. 20-0383

COMPLAINT

17  
18 I, the undersigned, say, on information and belief, that in  
19 the County of Yolo, or other properly joined jurisdictions, in  
20 State of California:

21 Count 1 : On or about October 21, 1992, PAUL ALLEN PEREZ  
22 did commit a FELONY, namely, a violation of Section 187(a) of  
23 the California Penal Code, MURDER, in that PAUL ALLEN PEREZ did  
24 willfully and unlawfully kill a human being, to wit, K.P. (DOB:  
25 August 16, 1992), with malice aforethought.

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1           Count Enhancement 1a : It is also alleged that PAUL ALLEN  
2 PEREZ is subject to a SPECIAL CIRCUMSTANCE within the meaning of  
3 Section 190.2(a)(15) of the California Penal Code in that  
4 defendant intentionally killed the victim by means of lying in  
5 wait.

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7           Count Enhancement 1b : It is also alleged that PAUL ALLEN  
8 PEREZ is subject to a SPECIAL CIRCUMSTANCE FOR TORTURE within  
9 the meaning of Section 190.2 (a) (18) , in that the defendant  
10 inflicted torture in the commission of murder.

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12           Count 2 : On or about November 2, 1995 through May 2, 1996,  
13 PAUL ALLEN PEREZ did commit a FELONY, namely, a violation of  
14 Section 187(a) of the California Penal Code, MURDER, in that  
15 PAUL ALLEN PEREZ did willfully and unlawfully kill a human  
16 being, to wit, M.P. (DOB: November 2, 1995), with malice  
17 aforethought.

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19           Count Enhancement 2a : It is also alleged that PAUL ALLEN  
20 PEREZ is subject to a SPECIAL CIRCUMSTANCE within the meaning of  
21 Section 190.2(a)(15) of the California Penal Code in that  
22 defendant intentionally killed the victim by means of lying in  
23 wait.

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25           Count Enhancement 2b : It is also alleged that PAUL ALLEN  
26 PEREZ is subject to a SPECIAL CIRCUMSTANCE FOR TORTURE within  
27 the meaning of Section 190.2 (a) (18) , in that the defendant  
28 inflicted torture in the commission of murder.

1 Count 3 : On or about November 8, 1996 through May 8, 1997,  
2 PAUL ALLEN PEREZ did commit a FELONY, namely, a violation of  
3 Section 187(a) of the California Penal Code, MURDER, in that  
4 PAUL ALLEN PEREZ did willfully and unlawfully kill a human  
5 being, to wit, N.P. (DOB: November 8, 1996), with malice  
6 aforethought.

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8 Count Enhancement 3a : It is also alleged that PAUL ALLEN  
9 PEREZ is subject to a SPECIAL CIRCUMSTANCE within the meaning of  
10 Section 190.2(a)(15) of the California Penal Code in that  
11 defendant intentionally killed the victim by means of lying in  
12 wait.

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14 Count Enhancement 3b : It is also alleged that PAUL ALLEN  
15 PEREZ is subject to a SPECIAL CIRCUMSTANCE FOR TORTURE within  
16 the meaning of Section 190.2 (a) (18) , in that the defendant  
17 inflicted torture in the commission of murder.

18  
19 Count 4 : On or about October 29, 1997 through April 29,  
20 1998, PAUL ALLEN PEREZ did commit a FELONY, namely, a violation  
21 of Section 187(a) of the California Penal Code, MURDER, in that  
22 PAUL ALLEN PEREZ did willfully and unlawfully kill a human  
23 being, to wit, N.P. (DOB: October 29, 1997), with malice  
24 aforethought.

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1 Count Enhancement 4a : It is also alleged that PAUL ALLEN  
2 PEREZ is subject to a SPECIAL CIRCUMSTANCE within the meaning of  
3 Section 190.2(a)(15) of the California Penal Code in that  
4 defendant intentionally killed the victim by means of lying in  
5 wait.

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7 Count Enhancement 4b : It is also alleged that PAUL ALLEN  
8 PEREZ is subject to a SPECIAL CIRCUMSTANCE FOR TORTURE within  
9 the meaning of Section 190.2 (a) (18) , in that the defendant  
10 inflicted torture in the commission of murder.

11  
12 Count 5 : On or about April 16, 2001 through October 16,  
13 2001, PAUL ALLEN PEREZ did commit a FELONY, namely, a violation  
14 of Section 187(a) of the California Penal Code, MURDER, in that  
15 PAUL ALLEN PEREZ did willfully and unlawfully kill a human  
16 being, to wit, K.P. (DOB: April 16, 2001), with malice  
17 aforethought.

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19 Count Enhancement 5a : It is also alleged that PAUL ALLEN  
20 PEREZ is subject to a SPECIAL CIRCUMSTANCE within the meaning of  
21 Section 190.2(a)(15) of the California Penal Code in that  
22 defendant intentionally killed the victim by means of lying in  
23 wait.

24  
25 Count Enhancement 5b : It is also alleged that PAUL ALLEN  
26 PEREZ is subject to a SPECIAL CIRCUMSTANCE FOR TORTURE within  
27 the meaning of Section 190.2 (a) (18) , in that the defendant  
28 inflicted torture in the commission of murder.

1 Count 6 : On or about November 2, 1995 through May 2, 1996,  
2 PAUL ALLEN PEREZ did commit a FELONY, namely, a violation of  
3 Section 273ab of the California Penal Code, ASSAULT ON CHILD  
4 UNDER EIGHT WITH FORCE LIKELY TO PRODUCE GREAT BODILY INJURY  
5 RESULTING IN DEATH, in that PAUL ALLEN PEREZ while having the  
6 care and custody of a child who was under eight years of age did  
7 willfully and unlawfully assault said child by means of force  
8 that to a reasonable person would be likely to produce great  
9 bodily injury and such assault did result in said child's death.  
10 To wit, M.P. (DOB: November 2, 1995).

11  
12 Count 7 : On or about November 8, 1996 through May 8, 1997,  
13 PAUL ALLEN PEREZ did commit a FELONY, namely, a violation of  
14 Section 273ab of the California Penal Code, ASSAULT ON CHILD  
15 UNDER EIGHT WITH FORCE LIKELY TO PRODUCE GREAT BODILY INJURY  
16 RESULTING IN DEATH, in that PAUL ALLEN PEREZ while having the  
17 care and custody of a child who was under eight years of age did  
18 willfully and unlawfully assault said child by means of force  
19 that to a reasonable person would be likely to produce great  
20 bodily injury and such assault did result in said child's death.  
21 To wit, N.P. (DOB: November 8, 1996).

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1           Count 8 : On or about October 29, 1997 through April 29,  
2 1998, PAUL ALLEN PEREZ did commit a FELONY, namely, a violation  
3 of Section 273ab of the California Penal Code, ASSAULT ON CHILD  
4 UNDER EIGHT WITH FORCE LIKELY TO PRODUCE GREAT BODILY INJURY  
5 RESULTING IN DEATH, in that PAUL ALLEN PEREZ while having the  
6 care and custody of a child who was under eight years of age did  
7 willfully and unlawfully assault said child by means of force  
8 that to a reasonable person would be likely to produce great  
9 bodily injury and such assault did result in said child's death.  
10 To wit, N.P. (DOB: October 29, 1997).

11  
12           Count 9 : On or about April 16, 2001 through October 16,  
13 2001, PAUL ALLEN PEREZ did commit a FELONY, namely, a violation  
14 of Section 273ab of the California Penal Code, ASSAULT ON CHILD  
15 UNDER EIGHT WITH FORCE LIKELY TO PRODUCE GREAT BODILY INJURY  
16 RESULTING IN DEATH, in that PAUL ALLEN PEREZ while having the  
17 care and custody of a child who was under eight years of age did  
18 willfully and unlawfully assault said child by means of force  
19 that to a reasonable person would be likely to produce great  
20 bodily injury and such assault did result in said child's death.  
21 To wit, K.P. (DOB: April 16, 2001).

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1 Case Enhancement a (Counts 1 through 5): It is also alleged  
2 that during the commission of the murder as charged in Counts 1  
3 through 5 above, PAUL ALLEN PEREZ did commit multiple murders of  
4 another, to wit, K.P. (DOB: 8/16/92); M.P. (DOB: 11/2/95); N.P.  
5 (DOB: 11/8/96); N.P. (DOB: 10/29/97); and K.P. (DOB: 4/16/01),  
6 within the meaning of Section 190.2(a)(3) of the California  
7 Penal Code, SPECIAL CIRCUMSTANCES FOR MULTIPLE MURDERS.

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9 Case Enhancement b (Counts 2 through 9): It is further  
10 alleged that PAUL ALLEN PEREZ was previously convicted of a  
11 serious felony within the meaning of Section 667(c) and  
12 667(e)(1) of the California Penal Code, ENHANCEMENT FOR ONE  
13 PRIOR FELONY CONVICTION THAT PROHIBITS PROBATION, LIMITS  
14 CREDITS, REQUIRES CONSECUTIVE SENTENCING, AND MANDATES PRISON  
15 COMMITMENT, in that PAUL ALLEN PEREZ was convicted of a prior  
16 felony as defined in Section 667(d) of the California Penal  
17 Code, and listed in Sections 667.5(c) and 1192.7(a) of the Penal  
18 Code, and Section 707(b) of the Welfare and Institutions Code,  
19 to wit, a conviction on February 14, 1990 for a violation of  
20 Section 220 of the California Penal Code, in the County of  
21 Merced.

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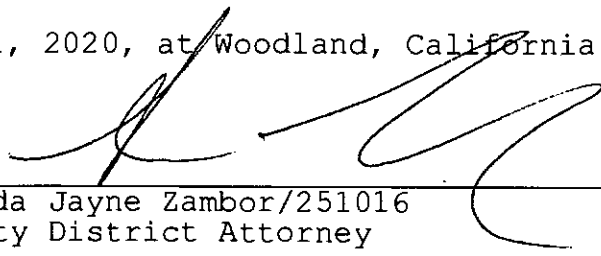
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1 Case Enhancement c (Counts 2 through 9): It is further  
2 alleged that PAUL ALLEN PEREZ was previously convicted of a  
3 serious felony within the meaning of Section 667(a)(1) of the  
4 California Penal Code, ENHANCEMENT FOR HABITUAL CRIMINALS, in  
5 that PAUL ALLEN PEREZ was convicted of a serious felony listed  
6 in Section 1192.7 of the Penal Code, to wit, Section 220 of the  
7 California Penal Code, on February 14, 1990 in the County of  
8 Merced.

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10 Notice: PAUL ALLEN PEREZ is being charged in Yolo County  
11 in Counts 1, 2, 4, 5, 6, 8 and 9, Pursuant to Penal Code Section  
12 790(b) and Penal Code Section 190.2(a)(3) which allows for  
13 jurisdiction within Yolo County.

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15 I declare under penalty of perjury that the foregoing is  
16 correct.

17 Executed on January 21, 2020, at Woodland, California.

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22 Amanda Jayne Zambor/251016  
23 Deputy District Attorney  
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