

1 DA Case ID No. 21-5433
2 In Custody 12/27/21 9:00 A
3 C. DAVID EYSTER (SBN #113115) ns
4 District Attorney
5 Mendocino County
6 Courthouse, Room G-10
7 Post Office Box 1000
8 Ukiah, CA 95482
9 (707) 463-4211

10 Attorneys for Plaintiff

FILED

12/23/2021

KIM TURNER, CLERK OF THE COURT
SUPERIOR COURT OF CALIFORNIA,
COUNTY OF MENDOCINO

Moore, Stephanie

DEPUTY CLERK

11 **SUPERIOR COURT OF CALIFORNIA**
12 **COUNTY OF MENDOCINO**

13 THE PEOPLE OF THE STATE OF
14 CALIFORNIA

15 Plaintiff,

16 v.

17 EZEQUIEL CEJA GUZMAN,

18 Defendant.

21CR002977

COMPLAINT-CRIMINAL
FELONY

[Bail Schedule: \$250,000]

19 **THE UNDERSIGNED, ON INFORMATION AND BELIEF, COMPLAINS AND SAYS,**
20 **THAT WITHIN THE COUNTY OF MENDOCINO, STATE OF CALIFORNIA**

21 **COUNT ONE**

22 Said defendant **EZEQUIEL CEJA GUZMAN** did on or about the 21st day of December
23 2021, commit the crime of GROSS VEHICULAR MANSLAUGHTER WHILE INTOXICATED, a
24 FELONY violation of Section 191.5(a) of the California Penal Code, in that said defendant did
25 then and there willfully kill Elevterio Roque, a human being, without malice or aforethought, in
26 the driving of a vehicle in violation of Vehicle Code section 23152 or 23153 and the killing was
27 the proximate result of the commission of an unlawful act, not amounting to a felony, and with
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1 gross negligence, or the proximate result of the commission of a lawful act which might
2 produce death, in an unlawful manner, and with gross negligence.

3 **FIRST SPECIAL ALLEGATION**

4 It is further alleged that the defendant **EZEQUIEL CEJA GUZMAN**, proximately
5 caused bodily injury or death to more than one victim during the commission of the above
6 offense within the meaning of Vehicle Code Section 23558. (Jesus Nava-Sandoval)

7 **SECOND SPECIAL ALLEGATION**

8 It is further alleged that the defendant **EZEQUIEL CEJA GUZMAN**, proximately
9 caused bodily injury or death to more than one victim during the commission of the above
10 offense(s) within the meaning of Vehicle Code Section 23558. (Phillip Ferris Harrison)

11 **COUNT TWO**


12 Said defendant **EZEQUIEL CEJA GUZMAN** did on or about the 21st day of December
13 2021, commit the crime of UNLICENSED DRIVER, a MISDEMEANOR violation of Section
14 12500(a) of the California Vehicle Code, in that said defendant did then and there drive a
15 motor vehicle upon a highway without holding a valid driver's license issued under the Vehicle
16 Code of the State of California.

17 The offenses charged in the **TWO COUNTS** of this complaint were of the same class
18 of crime or connected together in their commission.

19 Complainant therefore prays that said defendant be dealt with according to law.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Executed on December 23, 2021 in Ukiah, California.

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28 C. DAVID EYSTER
District Attorney

1 Pursuant to Penal Code Section 1054.3, the prosecuting attorney hereby requests that
2 the defendant and her attorney disclose the following:

3 "(a) The names and addresses of persons, other than the defendant, he or she intends
4 to call as witnesses at the trial, together with any relevant written or recorded statements of
5 those persons, or reports of the statements of those persons, including any reports of
6 statements of experts made in connection with the case, and including the results of physical
7 or mental examinations, scientific tests, experiments, or comparisons which the defendant
8 intends to offer in evidence at the trial."
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10 "(b) Any real evidence which the defendant intends to offer in evidence at the trial."
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