

1 DA Case ID No. 21-3325  
In Custody 8/11/21 9:00 A  
2 C. DAVID EYSTER (SBN #113115) ns  
3 District Attorney  
Mendocino County  
4 Courthouse, Room G-10  
Post Office Box 1000  
5 Ukiah, CA 95482  
(707) 463-4211  
6

7 Attorneys for Plaintiff

**FILED**

08/10/2021

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

Erickson, Caitlyn  
DEPUTY CLERK

8  
9 **SUPERIOR COURT OF CALIFORNIA**  
**COUNTY OF MENDOCINO**

10  
11 THE PEOPLE OF THE STATE OF  
CALIFORNIA

12 Plaintiff,

13  
14 v.

15 FERNANDO FRANCISCO,  
ABRAHAM SUMAN CASILLAS,  
16 AVERTANO DIAZ MARTINEZ,

17 Defendants.

21CR01572-A  
21CR01572-B  
21CR01572-C

COMPLAINT-CRIMINAL  
FELONY

[Bail Schedule: \$100,000]

18  
19 **THE UNDERSIGNED, ON INFORMATION AND BELIEF, COMPLAINS AND**  
20 **SAYS, THAT WITHIN THE COUNTY OF MENDOCINO, STATE OF CALIFORNIA**

21 **COUNT ONE**

22 Said defendants

23 **FERNANDO FRANCISCO**

24 **ABRAHAM SUMAN CASILLAS and**

25 **AVERTANO DIAZ MARTINEZ**  
26  
27  
28

1 did on the 7th day of August 2021 and during the month of August 2021, commit the  
2 crime of USING MINOR IN CANNABIS WORK, a FELONY violation of Section 11361(a)  
3 of the California Health & Safety Code, in that said defendants did then and there willfully  
4 and unlawfully hire, employ or intend to use a minor 14 years of age or older, to wit, A.F.,  
5 age 15 years, in transporting, carrying, selling, giving away, preparing for sale or peddling  
6 cannabis.  
7

8 **COUNT TWO**

9 Said defendants

10 **FERNANDO FRANCISCO**

11 **ABRAHAM SUMAN CASILLAS** and

12 **AVERTANO DIAZ MARTINEZ**  
13

14 did on the 7th day of August 2021 and during the month of August 2021, commit the  
15 crime of USING MINOR IN CANNABIS WORK, a FELONY violation of Section 11361(a)  
16 of the California Health & Safety Code, in that said defendants did then and there willfully  
17 and unlawfully hire, employ or intend to use a minor 14 years of age or older, to wit, D.C.,  
18 age 16 years, in transporting, carrying, selling, giving away, preparing for sale or peddling  
19 cannabis.  
20

21 **COUNT THREE**

22 Said defendants

23 **FERNANDO FRANCISCO**

24 **ABRAHAM SUMAN CASILLAS** and

25 **AVERTANO DIAZ MARTINEZ**  
26

27 did on or about the 7th day of August 2021, commit the crime of ENDANGERING THE  
28 HEALTH OF A CHILD, a MISDEMEANOR violation of Section 273a(b) of the California

1 Penal Code, in that said defendants did, under circumstances or conditions other than  
2 those likely to produce great bodily harm or death, willfully cause or permit a child, to wit,  
3 A.F., age 15 years, to be placed in a situation where his person or health may be  
4 endangered.

5  
6 **COUNT FOUR**

7 Said defendants

8 **FERNANDO FRANCISCO**

9 **ABRAHAM SUMAN CASILLAS** and

10 **AVERTANO DIAZ MARTINEZ**

11 did on or about the 7th day of August 2021, commit the crime of ENDANGERING THE  
12 HEALTH OF A CHILD, a MISDEMEANOR violation of Section 273a(b) of the California  
13 Penal Code, in that said defendants did, under circumstances or conditions other than  
14 those likely to produce great bodily harm or death, willfully cause or permit a child, to wit,  
15 D.C., age 16 years, to be placed in a situation where his person or health may be  
16 endangered.  
17

18 The offenses charged in the **FOUR COUNTS** of this complaint were of the same  
19 class of crime or connected together in their commission.  
20

21 Complainant therefore prays that said defendants be dealt with according to law.

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

23 Executed on August 10, 2021 in Ukiah, California.  
24

25   
26 \_\_\_\_\_  
27 C. DAVID EYSTER  
28 District Attorney

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

3 "(a) The names and addresses of persons, other than the defendant, he or she  
4 intends to call as witnesses at the trial, together with any relevant written or recorded  
5 statements of those persons, or reports of the statements of those persons, including any  
6 reports of statements of experts made in connection with the case, and including the  
7 results of physical or mental examinations, scientific tests, experiments, or comparisons  
8 which the defendant intends to offer in evidence at the trial."  
9

10 "(b) Any real evidence which the defendant intends to offer in evidence at the trial."  
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