

1 DA Case ID No. 21-1518
2 BTA 4/20/21 9:00 H
3 C. DAVID EYSTER (SBN #113115) sa
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

11 SUPERIOR COURT OF CALIFORNIA
12 COUNTY OF MENDOCINO

13 THE PEOPLE OF THE STATE OF
14 CALIFORNIA

15 Plaintiff,

16 v.

17 ARTURO FLORES VALDES,

18 Defendant.

19 **ZICROOSII**
20 COMPLAINT-CRIMINAL
21 FELONY

FILED

APR 20 2021

CLERK OF MENDOCINO COUNTY
SUPERIOR COURT OF CALIFORNIA

22 THE UNDERSIGNED, ON INFORMATION AND BELIEF, COMPLAINS AND SAYS,
23 THAT WITHIN THE COUNTY OF MENDOCINO, STATE OF CALIFORNIA

24 COUNT ONE

25 Said defendant **ARTURO FLORES VALDES** did on or about the 28th day of March
26 2021, commit the crime of ABUSING OR ENDANGERING HEALTH OF CHILD, a FELONY
27 violation of Section 273a(a) of the California Penal Code, in that said defendant did under
28 circumstances or conditions likely to produce great bodily harm or death, willfully cause or
permit a child to suffer, or inflict thereon unjustifiable physical pain or mental suffering, or
having the care or custody of a child, willfully cause or permit the person or health of that child
to be injured, or willfully cause or permit a child to be placed in a situation where his or her
person or health is endangered, to wit, A.V., 3 years old and A.A.V., 10 months old.

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COUNT TWO

Said defendant **ARTURO FLORES VALDES** did on or about the 28th day of March 2021, commit the crime of RESISTING AN OFFICER BY FORCE OR THREAT, a FELONY violation of Section 69(a) of the California Penal Code, in that said defendant did then and there attempt, by means of threat or violence, to deter or prevent an officer, to wit, Sergeant Donahue and Officer Rodello, from performing their duties, or knowingly resisted by the use of force or violence upon said officers in the performance of their duties.

COUNT THREE

Said defendant **ARTURO FLORES VALDES** did on or about the 28th day of March 2021, commit the crime of DRIVING UNDER THE INFLUENCE OF ALCOHOL, a MISDEMEANOR violation of Section 23152(a) of the California Vehicle Code, in that said defendant did then and there unlawfully drive a vehicle while under the influence of an alcoholic beverage.

COUNT FOUR

Said defendant **ARTURO FLORES VALDES** did on or about the 28th day of March 2021, commit the crime of DRIVING UNDER THE INFLUENCE WITH .08 PERCENT OR MORE ALCOHOL IN BLOOD, a MISDEMEANOR violation of Section 23152(b) of the California Vehicle Code, in that said defendant did then and there unlawfully drive a vehicle while having 0.08 percent or more, by weight of alcohol in his blood.

FIRST SPECIAL ALLEGATION

It is further alleged that the defendant **ARTURO FLORES VALDES**, before the commission of the above offenses, committed a MISDEMEANOR violation of Vehicle Code Section 23152(b), and was duly convicted thereof within the meaning of Vehicle Code Section 23540 on or about the 7th day of February, 2012, in the Superior Court, County of Sonoma, said offense having occurred on or about the 16th day of April, 2011.

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SECOND SPECIAL ALLEGATION

It is further alleged that the defendant **ARTURO FLORES VALDES**, before the commission of the above offense(s), committed a MISDEMEANOR violation of Vehicle Code Section 23152(b), and was duly convicted thereof within the meaning of Vehicle Code Section 23546(a), on or about the 1st day of December 2017 in the Superior Court, County of Sonoma, said offense having occurred on or about the 7th day of July 2017..

THIRD SPECIAL ALLEGATION

It is further alleged that the defendant **ARTURO FLORES VALDES**, during the commission of the above offenses had a passenger who was a minor under the age of fourteen years; and said defendant having previously been convicted of a misdemeanor violation of Section 23152, punishable under 23540, pursuant to California Vehicle Code Section 23572(a)(2).

FOURTH SPECIAL ALLEGATION

It is further alleged that the defendant **ARTURO FLORES VALDES**, during the commission of the above offenses had a passenger who was a minor under the age of fourteen years; and said defendant having previously been convicted of a misdemeanor violation of Section 23152, punishable under 23546, pursuant to California Vehicle Code Section 23572(a)(3).

FIFTH SPECIAL ALLEGATION

It is further alleged that the defendant **ARTURO FLORES VALDES**, had a blood alcohol content of 0.15 or higher within the meaning of Vehicle Code Section 23578.

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

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

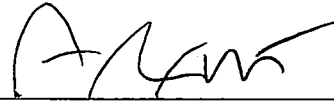
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on April 19, 2021 in Ukiah, California.

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5 ALEXANDER DIENER
6 Deputy District Attorney

7 Pursuant to Penal Code Section 1054.3, the prosecuting attorney hereby requests that
8 the defendant and his attorney disclose the following:

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

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