

STANISLAUS COUNTY SUPERIOR COURT
STATE OF CALIFORNIA

FILED

16 FEB -8 AM 8:03

CLERK OF THE SUPERIOR COURT
COUNTY OF STANISLAUS

BY Shirley J. Salazar DEPUTY

THE PEOPLE OF THE STATE OF CALIFORNIA,)
)
) vs.)
)
) **MARTIN MARTINEZ**)
) **[REDACTED]**)
) (IN CUSTODY) **Booking No. 1375257**)
))
) DEFENDANT(S))
)
) No. 1498584)

COMPLAINT -- CRIMINAL

MPD MP15067282

State of California)
County of Stanislaus) ss.

RICHARD B. MURY, III, OF THE STANISLAUS COUNTY DISTRICT ATTORNEY'S OFFICE, complains and alleges, upon information and belief that said defendant did commit the following crimes in the County of Stanislaus, State of California.

COUNT I: On or about July 18, 2015, defendant did commit a felony, MURDER, violation of Section 187(a) of the California Penal Code, in that the defendant did willfully, unlawfully, and feloniously and with malice aforethought murder **AMANDA CREWS**, a human being.

ENHANCEMENT: It is further alleged that the defendant acted intentionally, deliberately and with premeditation.

ENHANCEMENT: During the commission of the above offense, defendant personally used a deadly and dangerous weapon, to wit, a **KNIFE**, in violation of Section 12022(b)(1) of the California Penal Code.

SPECIAL ALLEGATION: It is further alleged as to Count I that the offenses charged in counts II, III, IV, and V are a special circumstance within the meaning of Penal Code section 190.2(a)(3).

SPECIAL ALLEGATION: It is further alleged as to Count I that the murder of **AMANDA CREWS** was committed by defendant and that the defendant intentionally killed the victim while lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

COUNT II: On or about July 18, 2015, defendant did commit a felony, MURDER, violation of Section 187(a) of the California Penal Code, in that the defendant did willfully, unlawfully, and feloniously and with malice aforethought murder **ANNA BROWN ROMERO**, a human being.

ENHANCEMENT: It is further alleged that the defendant acted intentionally, deliberately and with premeditation.

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ENHANCEMENT: During the commission of the above offense, defendant personally used a deadly and dangerous weapon, to wit, a **KNIFE**, in violation of Section 12022(b)(1) of the California Penal Code.

SPECIAL ALLEGATION: It is further alleged as to Count II that the offenses charged in counts I, III, IV, and V are a special circumstance within the meaning of Penal Code section 190.2(a)(3).

SPECIAL ALLEGATION: It is further alleged as to Count I that the murder of **ANNA BROWN ROMERO** was committed by defendant and that the defendant intentionally killed the victim while lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

COUNT III: On or about July 18, 2015, defendant did commit a felony, **MURDER**, violation of Section 187(a) of the California Penal Code, in that the defendant did willfully, unlawfully, and feloniously and with malice aforethought murder **ELIZABETH RIPLEY**, a human being.

ENHANCEMENT: It is further alleged that the defendant acted intentionally, deliberately and with premeditation.

SPECIAL ALLEGATION: It is further alleged as to Count III that the offenses charged in counts I, II, IV, and V are a special circumstance within the meaning of Penal Code section 190.2(a)(3).

SPECIAL ALLEGATION: It is further alleged as to Count III that the murder of **ELIZABETH RIPLEY** was committed by defendant and that the defendant intentionally killed the victim while lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

COUNT IV: On or about July 18, 2015, defendant did commit a felony, **MURDER**, violation of Section 187(a) of the California Penal Code, in that the defendant did willfully, unlawfully, and feloniously and with malice aforethought murder **ESMERALDA NAVARRO**, a human being.

ENHANCEMENT: It is further alleged that the defendant acted intentionally, deliberately and with premeditation.

SPECIAL ALLEGATION: It is further alleged as to Count IV that the offenses charged in counts I, II, III, and V are a special circumstance within the meaning of Penal Code section 190.2(a)(3).

SPECIAL ALLEGATION: It is further alleged as to Count IV that the murder of **ESMERALDA NAVARRO** was committed by defendant and that the defendant intentionally killed the victim while lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

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COUNT V: On or about July 18, 2015, defendant did commit a felony, MURDER, violation of Section 187(a) of the California Penal Code, in that the defendant did willfully, unlawfully, and feloniously and with malice aforethought murder **RACHEL MARTINEZ**, a human being.

ENHANCEMENT: It is further alleged that the defendant acted intentionally, deliberately and with premeditation.

SPECIAL ALLEGATION: It is further alleged as to Count V that the offenses charged in counts I, II, III, and IV are a special circumstance within the meaning of Penal Code section 190.2(a)(3).

SPECIAL ALLEGATION: It is further alleged as to Count V that the murder of **RACHAEL MARTINEZ** was committed by defendant and that the defendant intentionally killed the victim while lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

NOTICE: It is further alleged, pursuant to Penal Code Section 1170(h)(3) and 1170(f) that the defendant MARTIN MARTINEZ, is not eligible to be sentenced to a term of imprisonment in the county jail on an executed sentence. This allegation is not subject to dismissal pursuant to Penal Code Section 1385.

RBM/rcs

All of which is contrary to law in such cases made and provided, and against the peace and dignity of the People of the State of California.

I certify under penalty of perjury, at Modesto, California, that the foregoing is true and correct.

Dated: 2-5-16


Complainant