

1 DAN DOW
DISTRICT ATTORNEY
2 STATE BAR # 237986
COUNTY OF SAN LUIS OBISPO
3 COURTHOUSE ANNEX, 4TH FLOOR
SAN LUIS OBISPO, CA 93408
4 TELEPHONE: (805) 781-5800

<input type="checkbox"/> DV Case
<input type="checkbox"/> BOOKING REQ

5
6 *In Custody*

7
8 SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO
9 DEPARTMENT

11 THE PEOPLE OF THE STATE OF CALIFORNIA	COURT CASE NO.
12 Plaintiff,	COMPLAINT
13 vs.	
14 PAUL RUBEN FLORES DOB: 10/22/1976 ID NO. D000182939	DA CASE NO. 079-662557 21F-02402-A
16 RUBEN RICARDO FLORES 17 DOB: 04/09/1941 ID NO. D000445617 AKA RUBEN FLORES	DA CASE NO. 079-663275 21F-02402-B
19 Defendants.	Appearance Date:

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22 The District Attorney of San Luis Obispo County, California, hereby accuses the
23 above-named defendants of the following criminal offenses:

24 Count 1

25 On or about May 25, 1996, in the County of San Luis Obispo, State of California, the crime
26 of Murder in violation of Penal Code Section 187(a), a Felony, was committed in that PAUL
27 RUBEN FLORES did unlawfully, and with malice aforethought murder K.S., a human
28 being.

1 It is further alleged as to Count 1 that the murder was committed while the defendant was
2 engaged in the commission of, or attempting to commit, the crime of Rape, in violation of
3 Penal Code Section 261 within the meaning of Penal Code Section 189(a).

4
5 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
6 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c).

7
8 The People hereby give notice of the People's intent to admit evidence of prior sexual acts
9 pursuant to Evidence Code section 1108. These prior sexual acts include the prior
10 incidents described in the investigative reports and audio/video provided to defense, and
11 other alleged incidents of abuse, which will be provided as they are obtained by the
12 prosecution.

13 **Count 2**

14 On or between May 25, 1996 and April 13, 2021, in the County of San Luis Obispo, State
15 of California, the crime of Accessory After The Fact in violation of Penal Code Section 32,
16 a Felony, was committed in that RUBEN RICARDO FLORES unlawfully, having
17 knowledge that the crime of Murder, a felony, in violation of Penal Code Section 187 had
18 been committed by Paul Ruben Flores, did harbor, conceal, and aid said Paul Ruben
19 Flores, with the intent that Paul Ruben Flores might avoid and escape from arrest, trial,
20 conviction, and punishment for said felony.

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

3 I declare that an investigation has been conducted to determine if said Defendant(s)
4 did commit the stated crime, which reports are attached hereto and incorporated herein by
5 reference, and that the facts therein show probable cause that the said Defendant(s) did
6 commit the crime. Your declarant requests the issuance of a Warrant of Arrest either if
7 said Defendants do not appear voluntarily in response to an appearance letter, or if no
8 appearance letter was issued.

9 **Discovery Request:** Pursuant to Penal Code Section 1054.5(b), the People are
10 hereby informally requesting that defense counsel provide discovery to the people as
11 required by Penal Code Section 1054.3.

12 On this day April 13, 2021, in the County of San Luis Obispo, I certify and declare
13 under penalty of perjury that the foregoing is true and correct.

14 Dated: April 13, 2021

15 DAN DOW
16 DISTRICT ATTORNEY



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19 By: _____
20 ERIC J. DOBROTH
21 ASSISTANT DISTRICT ATTORNEY

22 Upon review of the reports attached and incorporated herein by reference, I find sufficient
23 probable cause to warrant the defendant(s) continued detention.

24 Dated: _____
25 _____
26 Judge of the Superior Court

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SUMMARY PAGE					
Count	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC187(a)		Paul Ruben Flores		
	EC1108		Paul Ruben Flores		
2	PC32		Ruben Ricardo Flores		