

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

SAN LUIS OBISPO SUPERIOR COURT
By: J. Platt,
Deputy Clerk

<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

10
11 THE PEOPLE OF THE STATE OF
CALIFORNIA

Plaintiff,

COURT CASE NO. **24F-04644**

COMPLAINT

12
13 vs.

14 **JUAN SANCHEZFLORES**
DOB: 09/07/1980
15 ID NO. D000463371
CII: A42313871
16

DA CASE NO. 079-702821

17
18 Defendant.

Appearance Date:

19
20 The District Attorney of San Luis Obispo County, California, hereby accuses the
21 above named defendant of the following criminal offenses:

22 Count 1

23 On or about or between May 1, 2019 and June 30, 2019, in the County of San Luis
24 Obispo, State of California, the crime of Forcible Rape in violation of PC261(a)(2), a
25 Felony, was committed in that JUAN SANCHEZFLORES did unlawfully have and
26 accomplish an act of sexual intercourse with a person, to wit, Confidential Victim, not his
27 spouse, against said person's will, by means of force, violence, duress, menace and/or
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1 fear of immediate and unlawful bodily injury on said person and another.

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3 NOTICE: Conviction of this offense will require the court to order you to submit to a blood
4 test for evidence of antibodies to the probable causative agent of Acquired Immune
5 Deficiency Syndrome (AIDS). Penal Code Section 1202.1.

6 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code
7 section 290. Willful failure to register is a crime.

8 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
9 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)

10 NOTICE: Penal Code 1203.065(a) prohibits a grant of probation for this offense. and

11 NOTICE: Penal Code 1203.065(a) prohibits the grant of probation or suspension of
12 imposition of sentence for this offense.

13 Prior

14 PC667.61(a) and (d): Spec Alleg-Sex Crimes - Aggravated Circumstances

15 It is further alleged, within the meaning of Penal Code sections 667.61(a) and (d), as to
16 defendant, JUAN SANCHEZFLORES, as to Count 1 that the following circumstances
17 apply: The defendant personally inflicted great bodily injury on the victim in the commission
18 of the present in violation of Penal Code Section 12022.7 offense, to wit: Pregnancy.

19 Count 2

20 On or about or between May 1, 2019 and June 30, 2019, in the County of San Luis
21 Obispo, State of California, the crime of Incest in violation of PC285, a Felony, was
22 committed in that JUAN SANCHEZFLORES did unlawfully , being over the age of 14 years
23 of age, commit fornication and adultery with Confidential Victim, both defendant and
24 Confidential Victim being persons within the degrees of consanguinity within which
25 marriages are declared by law to be incestuous and void.

26 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code
27 section 290. Willful failure to register is a crime.

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1 It is further alleged pursuant to Penal Code Section 1170(b)(2) that one or more of the
2 following factors in aggravation listed in California Rule of Court 4.421 may apply to the
3 defendant(s) or to conduct of the defendant(s):

4 4.421(a)(1) The crime involved great violence, great bodily harm, threat of great bodily
5 harm, and other acts disclosing a high degree of cruelty, viciousness and callousness.

6 4.421(a)(2) The defendant was armed with or used a weapon at the time of the
7 commission of the crime.

8 4.421(a)(3) The victim was particularly vulnerable.

9 4.421(a)(4) The defendant induced others to participate in the commission of the crime
10 and occupied a position of leadership and dominance of other participants in its
11 commission.

12 4.421(a)(5) The defendant induced a minor to commit and assist in the commission of the
13 crime.

14 4.421(a)(6) The defendant threatened witnesses, unlawfully prevented and dissuaded
15 witnesses from testifying, suborned perjury, and in any other way illegally interfered with
16 the judicial process.

17 4.421(a)(7) The defendant is charged with other crimes for which consecutive sentences
18 can be imposed but for which concurrent sentences shall be imposed.

19 4.421(a)(8) The manner in which the crime was carried out indicates planning,
20 sophistication, and professionalism.

21 4.421(a)(9) The crime involved an attempted or actual taking or damage of great monetary
22 value.

23 4.421(a)(10) The crime involved a large quantity of contraband.

24 4.421(a)(11) The defendant took advantage of a position of trust and confidence to commit
25 the offense.

26 4.421(a)(12) The crime constitutes a hate crime under section 422.55 of the Penal Code
27 and no hate crime enhancements under section 422.75 of the Penal Code shall be
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1 imposed and the crime is not subject to sentencing under section 1170.8 of the Penal
2 Code.

3 4.421(b)(1) The defendant has engaged in violent conduct that indicates a serious danger
4 to society.

5 4.421(b)(2) The defendant's prior convictions as an adult and sustained petitions in
6 juvenile delinquency proceedings are numerous and of increasing seriousness.

7 4.421(b)(3) The defendant has served a prior term in prison and county jail under section
8 1170(h).

9 4.421(b)(4) The defendant was on probation, mandatory supervision, post release
10 community supervision, and parole when the crime was committed.

11 4.421(b)(5) The defendant's prior performance on probation, mandatory supervision, post
12 release community supervision, and parole was unsatisfactory.

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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.

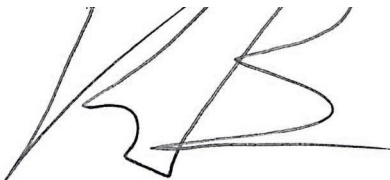
3 I declare that an investigation has been conducted to determine if said Defendant(s)
4 did commit the stated crime, which reports are attached hereto and incorporated herein by
5 reference, and that the facts therein show probable cause that the said Defendant(s) did
6 commit the crime. Your declarant requests the issuance of a Warrant of Arrest either if
7 said Defendant(s) 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 July 18, 2024, 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: July 18, 2024

15 DAN DOW
16 DISTRICT ATTORNEY

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18 By: _____
19 KRISTIN L BARNARD
20 DEPUTY DISTRICT ATTORNEY

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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

Cnt	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC261(a)(2) PC667.61(a) and (d)		Juan Sanchezflores		
2	PC285		Juan Sanchezflores		