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11/5/2024 3:04 PM

SAN LUIS OBISPO SUPERIOR COURT

By: P. Smith,  
Deputy Clerk

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

DV Case  
 BOOKING REQ

**IN CUSTODY**

8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF SAN LUIS OBISPO

11 THE PEOPLE OF THE STATE OF CALIFORNIA

12 Plaintiff,

13 vs.

14 **TYLER GRANT STEVENS**

15 DOB: 02/28/2003  
16 ID NO. D000454869  
17 CII: A40942195

18 Defendant.

COURT CASE NO. 24F-07875

COMPLAINT

**DA CASE NO. 079-706689**

Appearance Date:

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 October 23, 2024, in the County of San Luis Obispo, State of California, the  
24 crime of Murder in violation of Penal Code Section 187(a), a Felony, was committed in that  
25 TYLER GRANT STEVENS did unlawfully, and with malice aforethought murder Todd  
26 Joseph Pinion, a human being.

1 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section  
2 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)

3  
4 Enhancement

5 Penal Code Section 12022(b)(1): Special Allegation of Personal Use of Deadly Weapon  
6 It is further alleged as to count 1 that in the commission of the above offense, defendant,  
7 TYLER GRANT STEVENS, personally used a deadly and dangerous weapon, to wit, a  
8 knife, said use not being an element of the above offense, within the meaning of Penal  
9 Code Section 12022(b)(1) and causing the above offense to be a serious felony within the  
10 meaning of Penal Code Section 1192.7(c)(23).

11  
12 Enhancement

13 Penal Code Section 422.75(a): Special Allegation Commission of a Hate Crime  
14 It is further alleged as to count 1 that the defendant, TYLER GRANT STEVENS committed  
15 the above offense in violation of Penal Code Section 422.75(a), in that the criminal act was  
16 committed, in whole or in part, because of one or more of the victim's actual or perceived  
17 characteristics listed in Penal Code Section 422.55(a).

18  
19 Count 2

20 On or about October 23, 2024, in the County of San Luis Obispo, State of California, the  
21 crime of Cruelty to an Animal in violation of Penal Code Section 597(b), a Felony, was  
22 committed in that TYLER GRANT STEVENS did unlawfully, while having charge or custody  
23 of a dog, Spock, subject that dog to needless suffering, or inflict unnecessary cruelty upon  
24 the dog, or in any manner abuse the dog, or fail to provide the dog with proper food, drink,  
25 or shelter, or protection from the weather.

Prior 1

It is further alleged, pursuant to Penal Code Sections 667(d) and (e), and Penal Code Sections 1170.12(b) and (c), that defendant TYLER GRANT STEVENS has suffered the following prior conviction of a serious and/or violent felony:

Charge	S	Off. Date	Disp. Date	Sent. Date	Court #	Jurisdiction
Assault Upon Peace Officer with a Deadly Weapon (a motor vehicle)	F	12-18-2022	04-18-2023		22F-08621	San Luis Obispo

Prior 2

It is further alleged, pursuant to Penal Code section 667(a), that defendant TYLER GRANT STEVENS has suffered the following prior conviction of a serious felony:

Charge	S	Off. Date	Disp. Date	Sent. Date	Court #	Jurisdiction
Assault Upon Peace Officer with a Deadly Weapon (a motor vehicle)	F	12-18-2022	04-18-2023		22F-08621	San Luis Obispo

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

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

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

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

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

1 4.421(a)(7) The defendant is charged with other crimes for which consecutive  
2 sentences can be imposed but for which concurrent sentences shall be imposed.  
3 4.421(a)(8) The manner in which the crime was carried out indicates planning,  
4 sophistication, and professionalism.  
5 4.421(a)(11) The defendant took advantage of a position of trust and confidence to  
6 commit the offense.  
7 4.421(a)(12) The crime constitutes a hate crime under section 422.55 of the Penal  
8 Code and no hate crime enhancements under section 422.75 of the Penal Code shall  
9 be imposed and the crime is not subject to sentencing under section 1170.8 of the  
10 Penal Code.  
11 4.421(b)(1) The defendant has engaged in violent conduct that indicates a serious  
12 danger to society.  
13 4.421(b)(2) The defendant's prior convictions as an adult and sustained petitions in  
14 juvenile delinquency proceedings are numerous and of increasing seriousness.  
15 4.421(b)(3) The defendant has served a prior term in prison and county jail under  
16 section 1170(h).  
17 4.421(b)(4) The defendant was on probation, mandatory supervision, post release  
18 community supervision, and parole when the crime was committed.  
19 4.421(b)(5) The defendant's prior performance on probation, mandatory supervision,  
20 post 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 the  
2 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  
4 did commit the stated crimes, which reports are attached hereto and incorporated  
5 herein by reference, and that the facts therein show probable cause that the said  
6 Defendant did commit the crimes. Your declarant requests the issuance of a Warrant of  
7 Arrest either if said Defendant does not appear voluntarily in response to an  
8 appearance letter, or if no 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 November 5, 2024, in the County of San Luis Obispo, I certify and  
13 declare under penalty of perjury that the foregoing is true and correct.

14

15 Dated: November 5, 2024

16

DAN DOW  
DISTRICT ATTORNEY

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By:  
ERIC DOBROTH  
ASSISTANT DISTRICT ATTORNEY

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

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Dated: \_\_\_\_\_ Judge of the Superior Court

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SUMMARY PAGE

Cnt	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC187(a) PC12022(b)(1), PC422.75(a)		Tyler Grant Stevens		
2	PC597(b)		Tyler Grant Stevens		
	PC1170.12		Tyler Grant Stevens		
	PC667(a)		Tyler Grant Stevens		

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