

MAY 05 2023

BY  DEPUTY

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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF YOLO

11 THE PEOPLE OF THE STATE OF
12 CALIFORNIA,

Dept. 1

Case No.
CP2023-1391
COMPLAINT

13 Plaintiff,

14 vs.

15 CARLOS REALES

16 DOMINGUEZ (10/05/2002)

17 Defendant.

18
19 I, the undersigned, say, on information and belief, that in
20 the County of Yolo, State of California:

21
22 Count 1 : On or about April 26, 2023, CARLOS REALES
23 DOMINGUEZ did commit a FELONY, namely, a violation of Section
24 187(a) of the California Penal Code, MURDER, in that CARLOS
25 REALES DOMINGUEZ did willfully and unlawfully kill a human
26 being, to wit, D.B., with malice aforethought.

27 It is further alleged that the murder alleged above was
28 willful, deliberate and premeditated within the meaning of

1 California Penal Code Sections 189(a), ENHANCEMENT FOR WILLFUL,
2 DELIBERATE AND PREMEDITATED MURDER.

3 Count Enhancement 1a : It is further alleged that during
4 the commission or attempted commission of the felony charged
5 above, CARLOS REALES DOMINGUEZ did willfully, unlawfully, and
6 personally use a deadly or dangerous weapon, within the meaning
7 of Section 12022(b)(1) of the California Penal Code, USE OF
8 DEADLY WEAPON.

9
10 Count 2 : On or about April 29, 2023, CARLOS REALES
11 DOMINGUEZ did commit a FELONY, namely, a violation of Section
12 187(a) of the California Penal Code, MURDER, in that CARLOS
13 REALES DOMINGUEZ did willfully and unlawfully kill a human
14 being, to wit, K.A., with malice aforethought.

15 It is further alleged that the murder alleged above was
16 willful, deliberate and premeditated within the meaning of
17 California Penal Code Sections 189(a), ENHANCEMENT FOR WILLFUL,
18 DELIBERATE AND PREMEDITATED MURDER.

19 Count Enhancement 2a : It is further alleged that during
20 the commission or attempted commission of the felony charged
21 above, CARLOS REALES DOMINGUEZ did willfully, unlawfully, and
22 personally use a deadly or dangerous weapon, within the meaning
23 of Section 12022(b)(1) of the California Penal Code, USE OF
24 DEADLY WEAPON.

25
26 Count 3 : On or about May 1, 2023, CARLOS REALES DOMINGUEZ
27 did commit a FELONY, namely, a violation of Sections 21a, 664(a)
28 and 187(a) of the California Penal Code, ATTEMPTED MURDER, in

1 that CARLOS REALES DOMINGUEZ did willfully, unlawfully and with
2 malice aforethought attempt to murder K.G., a human being.

3 It is further alleged that the attempted murder alleged
4 above was willful, deliberate and premeditated within the
5 meaning of California Penal Code Sections 664(a) and 189,
6 ENHANCEMENT FOR WILLFUL, DELIBERATE AND PREMEDITATED ATTEMPTED
7 MURDER.

8 Count Enhancement 3a : It is further alleged that during
9 the commission or attempted commission of the felony charged
10 above, CARLOS REALES DOMINGUEZ did willfully, unlawfully, and
11 personally use a deadly or dangerous weapon, within the meaning
12 of Section 12022(b)(1) of the California Penal Code, USE OF
13 DEADLY WEAPON.

14 Count Enhancement 3b : It is further alleged that during
15 the commission of the felony charged above, CARLOS REALES
16 DOMINGUEZ did willfully, unlawfully, and personally inflict
17 great bodily injury upon any person, other than an accomplice,
18 within the meaning of Section 12022.7(a) of the California Penal
19 Code, INFLICTION OF GREAT BODILY INJURY.

20
21 Case Enhancement a : It is further alleged that the
22 offenses charged in Counts 1 and 2 involved the murders of two
23 separate victims within the meaning of Section 190.2(a)(3) of
24 the California Penal Code, SPECIAL CIRCUMSTANCES FOR MULTIPLE
25 MURDERS, in that CARLOS REALES DOMINGUEZ murdered more than one
26 person, to wit D.B. and K.A.

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1 Case Enhancement b : It is further alleged that CARLOS
2 REALES DOMINGUEZ, pursuant to Penal Code 1170(b) and California
3 Rules of Court Rule 4.421 that one or more of the following
4 circumstances apply to this case:

5 a. Relating to the crime, one or more of the following
6 things is true:

7 (1) The crime involved great violence, great bodily harm,
8 threat of great bodily harm, or other acts disclosing a high
9 degree of cruelty, viciousness, or callousness;

10 (2) The defendant was armed with or used a weapon at the
11 time of the commission of the crime;

12 (8) The manner in which the crime was carried out
13 indicates planning, sophistication, or professionalism;

14
15 (b) Relating to the defendant, one or more of the following
16 is true:

17 (1) The defendant has engaged in violent conduct that
18 indicates a serious danger to society.

19
20 I declare under penalty of perjury that the foregoing is
21 correct.

22 Executed on May 5, 2023, at Woodland, California.

23
24 /s/ Matthew De Moura

25 Matthew De Moura/278075
26 Deputy District Attorney