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SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SOLANO

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff

vs.

JONATHAN ALLEN (03/26/1989)  
Defendant

Case No.

FELONY COMPLAINT

The undersigned is informed and believes that:

**COUNT 1**

On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: TORTURE, a violation of Section 206 of the Penal Code of the State of California, County of Solano, in that said defendant did unlawfully and with the intent to cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon N. J.

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

**COUNT 2**

On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: TORTURE, a violation of Section 206 of the Penal Code of the State of California, County of Solano, in that said defendant did unlawfully and with the intent to cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon A. L. J.

**COPY**

1 "NOTICE: Conviction of this offense will require you to provide specimens and samples  
2 pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a  
3 crime."

4 **COUNT 3**

5 On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN  
6 did commit a felony namely: TORTURE, a violation of Section 206 of the Penal Code of the  
7 State of California, County of Solano, in that said defendant did unlawfully and with the intent to  
8 cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and  
9 for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon  
10 L. A. A.

11 "NOTICE: Conviction of this offense will require you to provide specimens and samples  
12 pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a  
13 crime."

14 **COUNT 4**

15 On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN  
16 did commit a felony namely: TORTURE, a violation of Section 206 of the Penal Code of the  
17 State of California, County of Solano, in that said defendant did unlawfully and with the intent to  
18 cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and  
19 for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon  
20 M. K. A.

21 "NOTICE: Conviction of this offense will require you to provide specimens and samples  
22 pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a  
23 crime."

24 **COUNT 5**

25 On or about and between April 22, 2016 and March 30, 2018, defendant JONATHAN ALLEN  
26 did commit a felony namely: TORTURE, a violation of Section 206 of the Penal Code of the  
State of California, County of Solano, in that said defendant did unlawfully and with the intent to  
cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and  
for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon  
A. A. A. (AUR. A.).

"NOTICE: Conviction of this offense will require you to provide specimens and samples  
pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a  
crime."

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**COUNT 6**

On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: TORTURE, a violation of Section 206 of the Penal Code of the State of California, County of Solano, in that said defendant did unlawfully and with the intent to cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon A. A. A. (AIY. A.).

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

**COUNT 7**

On or about and between November 24, 2016 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: TORTURE, a violation of Section 206 of the Penal Code of the State of California, County of Solano, in that said defendant did unlawfully and with the intent to cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon K. A. A.

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

**COUNT 8**

On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in that said defendant did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, N. J., to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

1 **COUNT 9**

2 On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN  
3 did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a  
4 violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in  
5 that said defendant did willfully and unlawfully, under circumstances likely to produce great  
6 bodily harm and death, injure, cause, and permit a child, A. L. J., to suffer and to be inflicted  
7 with unjustifiable physical pain and mental suffering, and, having the care and custody of said  
8 child, injure, cause, and permit the person and health of said child to be injured and did willfully  
9 cause and permit said child to be placed in such situation that his/her person and health was/were  
10 endangered.

11 **COUNT 10**

12 On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN  
13 did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a  
14 violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in  
15 that said defendant did willfully and unlawfully, under circumstances likely to produce great  
16 bodily harm and death, injure, cause, and permit a child, L. A. A., to suffer and to be inflicted  
17 with unjustifiable physical pain and mental suffering, and, having the care and custody of said  
18 child, injure, cause, and permit the person and health of said child to be injured and did willfully  
19 cause and permit said child to be placed in such situation that his/her person and health was/were  
20 endangered.

21 **COUNT 11**

22 On or about and between January 18, 2015 and March 30, 2018, defendant JONATHAN ALLEN  
23 did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a  
24 violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in  
25 that said defendant did willfully and unlawfully, under circumstances likely to produce great  
26 bodily harm and death, injure, cause, and permit a child, M. K. A., to suffer and to be inflicted  
with unjustifiable physical pain and mental suffering, and, having the care and custody of said  
child, injure, cause, and permit the person and health of said child to be injured and did willfully  
cause and permit said child to be placed in such situation that his/her person and health was/were  
endangered.

**COUNT 12**

On or about and between April 22, 2016 and March 30, 2018, defendant JONATHAN ALLEN  
did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a  
violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in  
that said defendant did willfully and unlawfully, under circumstances likely to produce great  
bodily harm and death, injure, cause, and permit a child, A. A. A. (AUR. A.), to suffer and to be  
inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody  
of said child, injure, cause, and permit the person and health of said child to be injured and did  
willfully cause and permit said child to be placed in such situation that his/her person and health  
was/were endangered.

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**COUNT 13**

On or about and between January 15, 2015 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in that said defendant did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, A. A. A. (AIY. A.), to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

**COUNT 14**

On or about and between June 21, 2014 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in that said defendant did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, J. M. A., to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

**COUNT 15**

On or about and between November 26, 2017 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in that said defendant did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, A. S. A. (AZA. A.), to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

**COUNT 16**

On or about and between May 1, 2015 and March 30, 2018, defendant JONATHAN ALLEN did commit a felony namely: CHILD ABUSE OR ENDANGERING HEALTH OF CHILD, a violation of Section 273a(a) of the Penal Code of the State of California, County of Solano, in that said defendant did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, A. W. A., to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

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It is further alleged, pursuant to Penal Code Sections 1170(h)(3), 1170(f) and 1385, that the defendant is not eligible to be sentenced to a term of imprisonment in the county jail on an executed sentence due to a prior or current felony conviction for a serious felony described in subdivision (c) of Penal Code Section 1192.7, or a prior or current conviction for a violent felony described in subdivision (c) of Penal Code Section 667.5, or a prior felony conviction in another jurisdiction for an offense that has all of the elements of a serious felony described in subdivision (c) of Penal Code Section 1192.7, or a violent felony described in subdivision (c) of Penal Code Section 667.5, or because the defendant is required to register as a sex offender pursuant to Penal Code Section 290, or because the defendant is convicted of a crime and as part of the sentence an enhancement pursuant to Penal Code Section 186.11 is imposed.

1 It is further alleged that the defendant JONATHAN ALLEN did commit acts which aggravate the  
2 above crime(s) pursuant to Rules 4.408 and 4.421 of the California Rules of Court.

3 **DISCOVERY REQUEST PURSUANT TO PENAL CODE SECTION 1054/1054.7:**

4 Pursuant to Penal Code sections 1054 through 1054.7, the People request that, within fifteen (15)  
5 days, the defendant and/or his/her attorney disclose: (a) The names and addresses of persons,  
6 other than the defendant, he/she intends to call as witnesses at trial, together with any relevant  
7 written or recorded statements of experts made in connection with the case, and including the  
8 results of physical or mental examinations, scientific tests, experiments, or comparisons which  
9 the defendant intends to offer in evidence at the trial. This request is a continuing request, to  
10 cover not only all such material currently in existence, but also all material which comes into  
11 existence to the conclusion of this case.

12 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND  
13 CORRECT AND THAT THIS COMPLAINT CONSISTS OF 16 COUNTS.

14 Executed at Fairfield, California, on May 10, 2018.

15 \_\_\_\_\_  
16 VERONICA JUAREZ  
17 DECLARANT AND COMPLAINANT

18 AGENCY: FAIRFIELD POLICE  
19 DEPARTMENT

D.A. NO.: F182024

20 Arresting Officer: , Badge #

21	22	23	24	25
DEFENDANT	CII NO	DOB	BOOKING NO	CUSTODY R'TN DATE
Jonathan Allen		03/26/1989	***	