

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
VICTORVILLE DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)	
)	
Plaintiff)	
)	
vs.)	
)	
Elisha Jones , Heaven Ramirez)	FELONY COMPLAINT
)	
)	
Defendant)	DA CASE NO 2020-00-0043179
<hr style="border: 0.5px solid black;"/>		

The undersigned is informed and believes that:

COUNT 1

On or about September 14, 2020, in the above named judicial district, the crime of ASSAULT ON A CHILD BECOMING COMATOSE/PARALYSIS, in violation of PENAL CODE SECTION 273ab(b), a felony, was committed by Elisha Jones, who did unlawfully, having care and custody of Zander R, a child under the age of 8 years, assault that child by means of force that to a reasonable person would be likely to produce bodily injury, resulting in the child becoming comatose due to brain injury and suffering paralysis of a permanent nature.

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

COUNT 2

On or about September 14, 2020, in the above named judicial district, the crime of TORTURE, in violation of PENAL CODE SECTION 206, a felony, was committed by Elisha Jones, who 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 Zander R.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

COUNT 3

On or about September 2, 2020 through September 14, 2020, in the above named judicial district, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Elisha Jones, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, Zander R, 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.

It is further alleged, within the meaning of Penal Code section 12022.7(d), as to count(s) 3 that defendant personally inflicted great bodily injury on Zander R who was under the age of five years.

COUNT 4

On or about September 2, 2020 through September 14, 2020, in the above named judicial district, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GBI OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by Heaven Ramirez, who did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit a child, Zander R, 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.

It is further alleged, within the meaning of Penal Code section 12022.7(d), as to count(s) 4 that defendant personally inflicted great bodily injury on Zander R who was under the age of five years.

* * * * *

NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5.(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 4 COUNT(S).

Executed at Victorville, California, on September 17, 2020.

Kathleen DiDonato

Kathleen DiDonato
DECLARANT AND COMPLAINANT

Agency: SB Sheriff CAC Division

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Elisha Jones	12/01/1996	2009300568		
Heaven Ramirez	03/29/2000	2009300571		