Jeannine M. Pacioni, District Attorney
MONTEREY COUNTY DISTRICT ATTORNEY'S OFFICE
James L. Laughlin, Deputy District Attorney
Kellin C. Dunne, Deputy District Attorney
142 W. Alisal St.
Salinas, CA 93902
Telephone: (831) 796-6045
FAX: (831) 755-5068

Attorneys for the Plaintiff

SUPERIOR COURT OF CALIFORNIA
COUNTY OF MONTEREY

THE PEOPLE OF THE STATE OF CALIFORNIA, **Plaintiff,** **V.** **PEDRO NAVA** **JONATHAN LEAL CERVANTES,** **Defendants.**	**CASE NOs. 24CRXXXXXX** **People's Bail Motion (*Penal Code* § 1275)** **DATE:** May 10, 2024 **TIME:** 1:30 PM **DEPT:** 1

The People of the State of California, by and through their attorneys, JEANNINE M. PACIONI, District Attorney, James L. Laughlin, Deputy District Attorney, and Kellin C. Dunne, Deputy District Attorney, submit the following motion for the Court to hold defendants without bail under *Penal Code* § 1275.

I. STATEMENT OF CASE

Defendants are members of Tiny Locos (TLS), a Greenfield-based Norteno subset. The People allege they committed six murders, seven attempted murders, and other offenses for the benefit of their gang. These offenses occurred in two shootings— one outside Greenfield on February 4, 2024 and the other in King City on March 3, 2024. For the reasons detailed below, the People request the Court hold each defendant without bail.

//

//

II. STATEMENT OF FACTS

A. January 24-26: Monterey Vehicle Theft

Between January 24-26 TLS member Angel E. stole a Kia Optima from a Monterey neighborhood. Over the next few days Angel E. kept this Kia parked near his Prunedale residence. At one point, a nearby resident photographed this unfamiliar Kia when it was parked near Angel E.'s residence.

B. February 3: King City Brandishing & Salinas Big 5 Robbery

On February 3, Defendant Cervantes, Angel E., and two more Norteno gang members drove the stolen Kia to King City. Just after they entered King City, an occupant exited the Kia, confronted a man walking on the sidewalk, brandished a firearm, and challenged his gang membership. Then Defendant Cervantes, Angel E., and their Norteno companions fled onto northbound Highway 101 in the Kia.

Five hours after the King City incident, Defendant Cervantes, Angel E., and three more Nortenos traveled in the stolen Kia to Big 5 in Salinas. There, Defendant Cervantes, Angel E., and two more armed Nortenos entered Big 5. Once inside, the masked robbers wielded firearms, threatened Big 5 employees, and stole ammunition from Big 5. Forensic testing on a vape pen dropped by an assailant during the robbery revealed Defendant Cervantes' DNA.

C. February 4: Thorne Rd. Double Murder

The day after the Big 5 robbery, Defendant Nava instructed Angel E. and Defendant Cervantes to murder. While their murder plot developed, cousins Jack Canchola and Andres Garcia attended a large church event in Soledad. Jack, who was autistic, often grew anxious around large crowds. And as the event went on, the large crowd prompted Jack's anxiety. Andres and Jack departed the event in Andres' Ford Ranger. They traveled south from Soledad to a bridge that crossed the Salinas River just outside Greenfield. Jack loved that location because he enjoyed water and watching the northerly flow of the Salinas River. As Jack and Andres drove to Jack's beloved spot they broadcast their activities on Instagram live. In this broadcast, they joked with one another while they listened to music. But then Defendant Cervantes and Angel E. drove up to them in the Kia and their group issued unmistakable gang threats. Neither Jack nor Andres maintained any gang affiliation. Then the

Instagram broadcast terminated when Jack called 911. In this 911 call Jack requested help and noted the menacing Kia.

After Andres' 911 call, a responding CHP officer located Jack's truck crashed in a vineyard just off Thorne Rd. The crash scene revealed an atrocity. Right next to the truck laid Jack and Andres, deceased on the ground. Dozens of shots inflicted fatal gunshot wounds that ended Jack and Andres' lives. Right by Andres' truck officers located the stolen Kia Optima, abandoned by Defendant Cervantes and Angel E., in the vineyard. Not long after the shooting, Defendant Nava picked up Defendant Cervantes and Angel E. from the crime scene then dropped them off in Greenfield. But Defendant Cervantes and Angel E. left several items inside the Optima. DNA testing on items left behind revealed Angel E. and Defendant Cervantes' DNA.

D. February 17: Pacific Grove Vehicle Burglary

Thirteen days after the double murder, Angel E. returned to the Monterey Peninsula once again. There, he stole a credit card in a Pacific Grove vehicle burglary. Then, Angel E. used this card to purchase an Apple e-gift card from Target.com. On the website purchase form, Angel E. supplied a false name but supplied an email address he controlled, and the phone number of a burner phone he owned. Investigation revealed Angel E. controlled an Instagram account that used the same email address. So officers served a search warrant on this Instagram account. And in private messages Angel E. sent from this Instagram account he sent someone his true Prunedale address and messaged another person to reach him on the same burner phone.

E. February 24: Pacific Grove Vehicle Theft

In mid-February 2024 Defendant Nava instructed Angel E. to steal another car. Then, on February 24 Angel E. returned to the Monterey Peninsula yet again. This time, Angel E. traveled to a residential neighborhood in Pacific Grove where he stole a Kia Rio. Several days later, a nearby resident photographed this unfamiliar Kia parked near Angel E.'s Prunedale residence.

F. March 3: King City Quadruple Murder

On March 3, 2024, Defendant Nava tasked Angel E. and Defendant Cervantes with a shooting that targeted a King City party. That party was Alicia Aparicio's 33rd birthday party. There, at a home on N. 2nd St. in King City, dozens of partygoers celebrated in front of the home while young

children zoomed around the party and bounced on the backyard trampoline. As Ms. Aparicio's birthday celebration continued, Defendant Cervantes, Angel E., and a third gunman entered King City in the stolen Kia Rio at 5:01 PM. Minutes later, when they passed the party for the first time, they viewed no celebration, only targets. So then Defendant Cervantes, Angel E., and the third gunman reconnoitered the party and drove past it several times.

When their observation of the party ended the Kia sped down N. 2nd St. and stopped right in front of the party at 5:58 PM. Then Defendant Cervantes, Angel E., and the third gunman exited the Kia. Surveillance footage captured the carnage they inflicted. These three gunmen fanned out so their gunfire bracketed dozens of partygoers in the front yard. And they targeted everyone as they fired dozens of rounds in less than 30 seconds. They murdered Ms. Aparicio at her own birthday party. They murdered Mario Guzman Mendoza. They murdered Francisco Aldape Perez. They murdered Olivo Perez Pina. Their gunfire struck and injured seven more partygoers. Then Defendant Cervantes, Angel E., and the third gunman returned to the Kia and fled to Greenfield. Over the next 24 hours, Defendant Nava celebrated this shooting in messages with Angel E. Two days later, deputies located the same Kia, abandoned, just outside Greenfield.

II. POINTS & AUTHORITIES

A. Public Safety is Primary Consideration in Setting Bail

When the Court sets bail it "shall take into consideration the protection of the public, the seriousness of the offense[s] charged, the previous criminal record of the defendant, and the probability of his or her appearing at trial or at a hearing of the case. The public safety shall be the primary consideration." (*Penal Code* § 1275(a)(1).) "In considering the seriousness of the offense[s] charged, a judge or magistrate shall include consideration of the alleged injury to the victim . . . [and] the alleged use of a firearm or other deadly weapon in the commission of the crime charged . . . by the" defendants. (*Penal Code* § 1275(a)(2).)

\\

\\

\\

III. ARGUMENT

A. The People Request that the Court Remand Defendants Without Bail Under *Penal Code* § 1275

The People ask that the Court hold defendants without bail under *Penal Code* § 1275. First, the People are unfamiliar with any Monterey County crime that involved more carnage than defendants inflicted here. Defendant Nava ordered two shootings that ended with Defendant Cervantes discharging dozens of rounds that targeted dozens of innocent victims. This gunfire killed six, injured seven, and imperiled dozens more. Accordingly, only custody without bail secures public safety here. (*Penal Code* § 1275(a)(1).) Second, the offenses charged in this case are serious. Indeed, the offenses charged here carry a maximum sentence of LWOP or death. (*Id*.). On top of that, the severity of these offenses is increased by the firearms employed in each shooting. (*Penal Code* § 1275(a)(2).) Third, when all offenses occurred probation supervised both defendants for prior felony offenses. (*Penal Code* § 1275(a)(1).) For those reasons, no amount of bail secures public safety. Thus, the People request the Court hold defendants without bail.

IV. CONCLUSION

Based on the foregoing, the People request the Court hold defendants without bail.

Date: May 10, 2024

Respectfully submitted,

JEANNINE M. PACIONI,
DISTRICT ATTORNEY

By: _____
James L. Laughlin
Deputy District Attorney
Attorney for the Plaintiff

By: _____
Kellin C. Dunne
Deputy District Attorney
Attorney for the Plaintiff