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SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN

Manteca Branch

The People of the State of California,
Plaintiff,

v.

OSCAR ALONZO MUNOZ
CAMILA PIZARRO-VERGARA

Defendant(s).

No. TP20-05815
TPD CASE
DA Case: CR-2020-4237243

**COMPLAINT
CASA**

I, the undersigned, say, on information and belief, that in the
County of SAN JOAQUIN, State of California:

COUNT 1: CHILD ABUSE RESULTING IN DEATH (CHILD UNDER 8) PC.273ab(a)

On or about November 8, 2020 - November 16, 2020, in the County of
San Joaquin, California, CAMILA PIZARRO-VERGARA and OSCAR ALONZO
MUNOZ, did commit the crime of CHILD ABUSE RESULTING IN DEATH, in
violation of Section 273ab(a) the Penal Code, a FELONY, who at the

1 time and place last aforesaid, while having care and custody of a
2 child under the age of eight (8) years, to-wit: "JOHN M. DOE",
3 06/26/2016, did willfully and unlawfully assault said child by means
4 of force that to a reasonable person would be likely to produce
5 great bodily injury which resulted in the child's death.
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8 For a further and separate cause of complaint, being a different
9 offense from but connected in its commission with the charge(s)
10 above, complainant further complains and says:
11

12 **COUNT 2: MURDER PC.187(A)**

13 On or about November 8, 2020 - November 16, 2020, in the County of
14 San Joaquin, California, CAMILA PIZARRO-VERGARA and OSCAR ALONZO
15 MUNOZ, did commit the crime of MURDER, in violation of Section
16 187(a) of the Penal Code, a FELONY, who at the time and place last
17 aforesaid, did willfully and unlawfully and intentionally and with
18 malice aforethought murder, "JOHN M. DOE", date of birth:
19 06/26/2016, a human being. It is further alleged that the above
20 offense is a serious felony within the meaning of Penal Code Section
21 1192.7(c)(1).
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24 For a further and separate cause of complaint, being a different
25 offense from but connected in its commission with the charge(s)
26 above, complainant further complains and says:
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1 **COUNT 3: CHILD ABUSE/ENDANGERMENT PC.273A(A)**

2 On or about November 8, 2020 - November 16, 2020, in the County of
3 San Joaquin, California, CAMILA PIZARRO-VERGARA and OSCAR ALONZO
4 MUNOZ, did commit the crime of CHILD ABUSE/ENDANGERMENT, in
5 violation of Section 273a(a) of the Penal Code, a FELONY, who at the
6 time and place last aforesaid, did willfully and unlawfully, under
7 circumstances likely to produce great bodily harm and death, injure,
8 cause, and permit a child, "JOHN M. DOE", date of birth 06/26/2016,
9 to suffer and to be inflicted with unjustifiable physical pain and
10 mental suffering, and having the care and custody of said child,
11 injure, cause and permit the person and health of said child to be
12 injured and did willfully cause and permit said child to be placed
13 in such situation that his/her person and health was endangered, TO
14 WIT: FAILURE TO PROTECTF THE CHILD.
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18 For a further and separate cause of complaint, being a different
19 offense from but connected in its commission with the charge(s)
20 above, complainant further complains and says:
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22 **COUNT 4: CHILD ABUSE/ENDANGERMENT PC.273A(A)**

23 On or about November 8, 2020 - November 16, 2020, in the County of
24 San Joaquin, California, CAMILA PIZARRO-VERGARA and OSCAR ALONZO
25 MUNOZ, did commit the crime of CHILD ABUSE/ENDANGERMENT, in
26 violation of Section 273a(a) of the Penal Code, a FELONY, who at the
27 time and place last aforesaid, did willfully and unlawfully, under
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1 circumstances likely to produce great bodily harm and death, injure,
2 cause, and permit a child, "JOHN M. DOE", date of birth 06/26/2016,
3 to suffer and to be inflicted with unjustifiable physical pain and
4 mental suffering, and having the care and custody of said child,
5 injure, cause and permit the person and health of said child to be
6 injured and did willfully cause and permit said child to be placed
7 in such situation that his/her person and health was endangered, TO
8 WIT: FAILURE TO ADVISE THE DOCTOR HOW THE CHILD WAS INJURED.
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11 If the above-named defendant(s) is/are presently on probation in San
12 Joaquin County, any evidence presented at a preliminary hearing in
13 the instant case will be used not only as a basis for a holding
14 order in this case but also as evidence of a violation of probation
15 and, at any formal hearing on that violation of probation, the
16 People will move the transcript of the preliminary hearing into
17 evidence as a basis for the violation.
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19
20 Pursuant to Penal Code Section 1054.5(b), the People hereby
21 informally request that the defendant and his/her attorney disclose
22 to the People all information and materials described in Penal Code
23 Section 1054.3.
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1 I declare under penalty of perjury that the foregoing is true and
2 correct except for those things stated on information and belief and
3 those I believe to be true.
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5 Executed on 11/23/2020, at Stockton, California.
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