

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

06/08/2021
11:03 AM

DAVID H. YAMASAKI, Clerk of the Court
21CF1703

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7)
8 Plaintiff,)
9)
10 vs.) No.
11) CHPC 202101000
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Defendant(s))

15 The Orange County District Attorney charges that in Orange
16 County, California, the law was violated as follows:

17 COUNT 1: On or about May 21, 2021, in violation of Section 187
18 (a) of the Penal Code (MURDER), a FELONY, MARCUS ANTHONY ERIZ
19 did unlawfully and with malice aforethought kill AIDEN LEOS, a
20 human being.

21 COUNT 2: On or about May 21, 2021, in violation of Section 246
22 of the Penal Code (SHOOTING AT OCCUPIED MOTOR VEHICLE), a
23 FELONY, MARCUS ANTHONY ERIZ did willfully, maliciously, and
unlawfully discharge a firearm at an occupied motor vehicle.

24 COUNT 3: On or about May 21, 2021, in violation of Section 32 of
25 the Penal Code (ACCESSORY AFTER THE FACT), a FELONY, WYNNE LEE,
26 knowing that MARCUS ANTHONY ERIZ committed the crime of MURDER,
27 a felony, in violation of section 187(a) of the Penal Code, did
28 unlawfully harbor, conceal, and aid MARCUS ANTHONY ERIZ with
the intent that MARCUS ANTHONY ERIZ might avoid and escape from
arrest, trial, conviction, and punishment for the felony.

/

1 COUNT 4: On or about May 21, 2021, in violation of Sections
2 25400(a)(1)/(c)(7) of the Penal Code (CONCEALED FIREARM IN
3 VEHICLE), a MISDEMEANOR, WYNNE LEE, did unlawfully carry
4 concealed within a vehicle under the defendant's control and
direction a firearm capable of being concealed upon the person.

5 ENHANCEMENT(S)

6 As to Count(s) 1 and 2, it is further alleged pursuant to Penal
7 Code section 12022.53(d) (PERSONAL DISCHARGE OF FIREARM CAUSING
8 GREAT BODILY INJURY AND DEATH), and within the meaning of Penal
9 Code sections 1192.7 and 667.5, that defendant MARCUS ANTHONY
10 ERIZ intentionally and personally discharged a firearm
11 proximately causing great bodily injury and death to AIDEN LEOS,
who was not an accomplice, during the commission and attempted
commission of the above offense.

12 I declare under penalty of perjury, on information and belief,
13 that the foregoing is true and correct.

14 Dated 06-08-2021 at Orange County, California.

15 WB/JR 21F01035

16
17 TODD SPITZER, DISTRICT ATTORNEY

18 by: /s/ WHITNEY BOKOSKY

19 WHITNEY BOKOSKY, Deputy District Attorney

20 RESTITUTION CLAIMED

21 [] None

22 [] \$ _____

23 [X] To be determined

24 BAIL RECOMMENDATION:

25 MARCUS ANTHONY ERIZ - \$ 2,000,000.00

26 WYNNE LEE - \$ 500,000.00

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NOTICES:

The People request that defendant and counsel disclose, within 15 days, all of the materials and information described in Penal Code section 1054.3, and continue to provide any later-acquired materials and information subject to disclosure, and without further request or order.

Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.