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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF YOLO

11 THE PEOPLE OF THE STATE OF  
12 CALIFORNIA,

Dept. 9 Case No. 15003694

13 Plaintiff,

COMPLAINT

14 vs.

15 ALAMAR CYRIL HOUSTON,

16 Defendant(s)

17  
18 I, the undersigned, say, on information and belief, that in  
19 the County of Yolo, State of California:

21 **Cyclist #1 (D.D.)**

22  
23 Count 1 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
24 did commit a FELONY, namely, a violation of Sections 21a, 664(a)  
25 and 187(a) of the California Penal Code, ATTEMPTED MURDER, in  
26 that ALAMAR CYRIL HOUSTON did willfully, unlawfully and with  
27 malice aforethought attempt to murder D.D., a human being.

28 //

1           Count Enhancement 1a : It is further alleged that the  
2 attempted murder alleged above was willful, deliberate and  
3 premeditated within the meaning of California Penal Code  
4 Sections 664(a) and 189, ENHANCEMENT FOR WILLFUL, DELIBERATE AND  
5 PREMEDITATED ATTEMPTED MURDER.  
6

7           Count Enhancement 1b : It is further alleged that during  
8 the commission or attempted commission of the felony charged  
9 above, ALAMAR CYRIL HOUSTON did willfully, unlawfully, and  
10 personally use a deadly or dangerous weapon, within the meaning  
11 of Section 12022(b) (1) of the California Penal Code, USE OF  
12 DEADLY WEAPON.  
13

14           Count 2 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
15 did commit a FELONY, namely, a violation of Section 245(a)(1) of  
16 the California Penal Code, ASSAULT WITH A DEADLY WEAPON, in that  
17 ALAMAR CYRIL HOUSTON did willfully and unlawfully commit an  
18 assault upon D.D. with a deadly weapon or instrument other than  
19 a firearm, to wit, car.  
20

21           Count 3 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
22 did commit a FELONY, namely, a violation of Section 23153(a) of  
23 the California Vehicle Code, DRIVING UNDER THE INFLUENCE OF  
24 DRUGS CAUSING INJURY, in that ALAMAR CYRIL HOUSTON did willfully  
25 and unlawfully drive a vehicle while under the influence of any  
26 drug, and concurrently did any act forbidden by law and neglect  
27 a duty imposed by law in driving the vehicle, which act or  
28 neglect did proximately cause bodily injury to any person other

1 than ALAMAR CYRIL HOUSTON.

2  
3 **Cyclist #2 (T.J.)**  
4

5 Count 4 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
6 did commit a FELONY, namely, a violation of Sections 21a, 664(a)  
7 and 187(a) of the California Penal Code, ATTEMPTED MURDER, in  
8 that ALAMAR CYRIL HOUSTON did willfully, unlawfully and with  
9 malice aforethought attempt to murder T.J., a human being.  
10

11 Count Enhancement 4a : It is further alleged that the  
12 attempted murder alleged above was willful, deliberate and  
13 premeditated within the meaning of California Penal Code  
14 Sections 664(a) and 189, ENHANCEMENT FOR WILLFUL, DELIBERATE AND  
15 PREMEDITATED ATTEMPTED MURDER.  
16

17 Count Enhancement 4b : It is further alleged that during  
18 the commission or attempted commission of the felony charged  
19 above, ALAMAR CYRIL HOUSTON did willfully, unlawfully, and  
20 personally use a deadly or dangerous weapon, within the meaning  
21 of Section 12022(b)(1) of the California Penal Code, USE OF  
22 DEADLY WEAPON.  
23

24 Count Enhancement 4c : It is further alleged that during  
25 the commission of the felony charged above, ALAMAR CYRIL HOUSTON  
26 did willfully, unlawfully, and personally inflict great bodily  
27 injury upon any person other than an accomplice and that said  
28 injury did cause the victim to become comatose due to brain

1 injury or suffer paralysis of a permanent nature, within the  
2 meaning of Section 12022.7(b) of the California Penal Code,  
3 INFLECTION OF GREAT BODILY INJURY.  
4

5 Count 5 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
6 did commit a FELONY, namely, a violation of Section 245(a)(1) of  
7 the California Penal Code, ASSAULT WITH A DEADLY WEAPON, in that  
8 ALAMAR CYRIL HOUSTON did willfully and unlawfully commit an  
9 assault upon T.J. with a deadly weapon or instrument other than  
10 a firearm, to wit, car.  
11

12 Count Enhancement 5a : It is further alleged that during  
13 the commission of the felony charged above, ALAMAR CYRIL HOUSTON  
14 did willfully, unlawfully, and personally inflict great bodily  
15 injury upon any person other than an accomplice and that said  
16 injury did cause the victim to become comatose due to brain  
17 injury or suffer paralysis of a permanent nature, within the  
18 meaning of Section 12022.7(b) of the California Penal Code,  
19 INFLECTION OF GREAT BODILY INJURY.  
20

21 Count 6 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
22 did commit a FELONY, namely, a violation of Section 23153(a) of  
23 the California Vehicle Code, DRIVING UNDER THE INFLUENCE OF  
24 DRUGS CAUSING INJURY, in that ALAMAR CYRIL HOUSTON did willfully  
25 and unlawfully drive a vehicle while under the influence of any  
26 drug, and concurrently did any act forbidden by law and neglect  
27 a duty imposed by law in driving the vehicle, which act or  
28 neglect did proximately cause bodily injury to any person other

1 than ALAMAR CYRIL HOUSTON.

2  
3 **Cyclist #3 (J.J.)**  
4

5 Count 7 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
6 did commit a FELONY, namely, a violation of Sections 21a, 664(a)  
7 and 187(a) of the California Penal Code, ATTEMPTED MURDER, in  
8 that ALAMAR CYRIL HOUSTON did willfully, unlawfully and with  
9 malice aforethought attempt to murder J.J., a human being.  
10

11 Count Enhancement 7a : It is further alleged that the  
12 attempted murder alleged above was willful, deliberate and  
13 premeditated within the meaning of California Penal Code  
14 Sections 664(a) and 189, ENHANCEMENT FOR WILLFUL, DELIBERATE AND  
15 PREMEDITATED ATTEMPTED MURDER.  
16

17 Count Enhancement 7b : It is further alleged that during  
18 the commission or attempted commission of the felony charged  
19 above, ALAMAR CYRIL HOUSTON did willfully, unlawfully, and  
20 personally use a deadly or dangerous weapon, within the meaning  
21 of Section 12022(b)(1) of the California Penal Code, USE OF  
22 DEADLY WEAPON.  
23

24 Count Enhancement 7c : It is further alleged that during  
25 the commission of the felony charged above, ALAMAR CYRIL HOUSTON  
26 did willfully, unlawfully, and personally inflict great bodily  
27 injury upon any person, other than an accomplice, within the  
28 meaning of Section 12022.7(a) of the California Penal Code,

1 INFLICTION OF GREAT BODILY INJURY.  
2

3 Count 8 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
4 did commit a FELONY, namely, a violation of Section 245(a)(1) of  
5 the California Penal Code, ASSAULT WITH A DEADLY WEAPON, in that  
6 ALAMAR CYRIL HOUSTON did willfully and unlawfully commit an  
7 assault upon J.J. with a deadly weapon or instrument other than  
8 a firearm, to wit, car.  
9

10 Count Enhancement 8a : It is further alleged that during  
11 the commission of the felony charged above, ALAMAR CYRIL HOUSTON  
12 did willfully, unlawfully, and personally inflict great bodily  
13 injury upon any person, other than an accomplice, within the  
14 meaning of Section 12022.7(a) of the California Penal Code,  
15 INFLICTION OF GREAT BODILY INJURY.  
16

17 Count 9 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
18 did commit a FELONY, namely, a violation of Section 23153(a) of  
19 the California Vehicle Code, DRIVING UNDER THE INFLUENCE OF  
20 DRUGS CAUSING INJURY, in that ALAMAR CYRIL HOUSTON did willfully  
21 and unlawfully drive a vehicle while under the influence of any  
22 drug, and concurrently did any act forbidden by law and neglect  
23 a duty imposed by law in driving the vehicle, which act or  
24 neglect did proximately cause bodily injury to any person other  
25 than ALAMAR CYRIL HOUSTON.

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1           **Other Acts:**

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3           Count 10 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
4 did commit a FELONY, namely, a violation of Sections 211 and  
5 212.5(c) of the California Penal Code, SECOND DEGREE ROBBERY, in  
6 that ALAMAR CYRIL HOUSTON did willfully and unlawfully take  
7 personal property in the possession of another person, to wit,  
8 P.K., from the person and immediate presence of said person and  
9 the taking was against such person's will, accomplished by means  
10 of force and fear.

11  
12           Count 11 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
13 did commit a FELONY, namely, a violation of Section 10851(a) of  
14 the California Vehicle Code, THEFT OR UNAUTHORIZED USE OF  
15 VEHICLE, in that ALAMAR CYRIL HOUSTON did willfully and  
16 unlawfully drive and take a vehicle, to wit, 2105 Hyundai  
17 Tuscon, not ALAMAR CYRIL HOUSTON's own, without the consent of  
18 the owner thereof, and with intent either permanently or  
19 temporarily to deprive the owner thereof of title to or  
20 possession of said vehicle and ALAMAR CYRIL HOUSTON is a party  
21 or accessory to or an accomplice in the driving or unauthorized  
22 taking or stealing of said vehicle.

23  
24           Count 12 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
25 did commit a FELONY, namely, a violation of Section 496(a) of  
26 the California Penal Code, RECEIVING STOLEN PROPERTY, in that  
27 ALAMAR CYRIL HOUSTON did willfully and unlawfully buy, receive,  
28 conceal, sell, withhold and aid in concealing, selling and



1 withholding property, to wit, 2015 Hyundai Tuscon, which had  
2 been stolen, knowing that said property had been stolen.

3  
4 Count 13 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
5 did commit a FELONY, namely, a violation of Section 2800.2 of  
6 the California Vehicle Code, EVADING A PEACE OFFICER WITH  
7 RECKLESS DRIVING, in that ALAMAR CYRIL HOUSTON did willfully and  
8 unlawfully operate a motor vehicle in a willful and wanton  
9 disregard for the safety of persons and property and with the  
10 intent to evade and did willfully flee and otherwise attempt to  
11 elude a pursuing peace officer's motor vehicle when the  
12 following conditions existed: (a) The peace officer's motor  
13 vehicle was exhibiting at least one lighted red lamp visible  
14 from the front and ALAMAR CYRIL HOUSTON either saw and  
15 reasonably should have seen the lamp; (b) The peace officer's  
16 motor vehicle was sounding a siren as may be reasonably  
17 necessary; (c) The peace officer's motor vehicle was  
18 distinctively marked; and (d) The peace officer's motor vehicle  
19 was operated by a peace officer as defined in Chapter 4.5 of the  
20 Penal Code, and that peace officer was wearing a distinctive  
21 uniform.

22  
23 Count 14 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
24 did commit a FELONY, namely a violation of Section 2800.4 or the  
25 California Vehicle Code, EVADING A PEACE OFFICER WHILE DRIVING  
26 IN THE OPPOSITE DIRECTION, in that ALAMAR CYRIL HOUSTON did  
27 willfully and unlawfully operate a motor vehicle with the intent  
28 to evade and did willfully flee and otherwise attempt to elude a



1 pursuing peace officer's motor vehicle and did willfully drive  
2 on a highway in a direction opposite to that in which the  
3 traffic lawfully moves upon that highway when the following  
4 conditions existed: (a) The peace officer's motor vehicle was  
5 exhibiting at least one lighted red lamp visible from the front  
6 and ALAMAR CYRIL HOUSTON either saw and reasonably should have  
7 seen the lamp; (b) The peace officer's motor vehicle was  
8 sounding a siren as may be reasonably necessary; (c) The peace  
9 officer's motor vehicle was distinctively marked; and (d) The  
10 peace officer's motor vehicle was operated by a peace officer as  
11 defined in Chapter 4.5 of the Penal Code, and that peace officer  
12 was wearing a distinctive uniform.

13  
14 Count 15 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
15 did commit a MISDEMEANOR, namely, a violation of Section  
16 14601.1(a) of the California Vehicle Code, DRIVING WHILE DRIVING  
17 PRIVILEGE SUSPENDED OR REVOKED, in that ALAMAR CYRIL HOUSTON did  
18 willfully and unlawfully drive a motor vehicle at any time when  
19 ALAMAR CYRIL HOUSTON's driving privilege was suspended and  
20 revoked and ALAMAR CYRIL HOUSTON knew of the suspension and  
21 revocation.

22  
23 Count 16 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
24 did commit a MISDEMEANOR, namely, a violation of Section 600(a)  
25 of the California Penal Code, HARMING, INTERFERING WITH OR  
26 OBSTRUCTING A PEACE OFFICER'S HORSE OR DOG RESULTING IN INJURY,  
27 in that ALAMAR CYRIL HOUSTON did willfully, unlawfully,  
28 maliciously, and with no legal justification strike, beat, kick,

1 cut, stab, shoot with a firearm, administer any poison or other  
2 harmful or stupefying substance to, and throw, hurl, or project  
3 at, and place any rock, object, or other substance which is used  
4 in such a manner as to be capable of producing injury and likely  
5 to produce injury, on or in the path of, any horse being used  
6 by, or any dog under the supervision of, any peace officer in  
7 the discharge or attempted discharge of his or her duties. It  
8 is further alleged that an injury was inflicted upon such  
9 animal.

10  
11 Count 17 : On or about June 30, 2015, ALAMAR CYRIL HOUSTON  
12 did commit a MISDEMEANOR, namely, a violation of Section  
13 148(a)(1) of the California Penal Code, RESISTING OR OBSTRUCTING  
14 PEACE OFFICER in that ALAMAR CYRIL HOUSTON did willfully and  
15 unlawfully resist, delay or obstruct any peace officer in the  
16 discharge of and in the attempt to discharge a duty of said  
17 person's employment and office.

18  
19 Case Enhancement a : It is further alleged that ALAMAR  
20 CYRIL HOUSTON was previously convicted of a serious felony  
21 within the meaning of Section 667(c) and 667(e)(1) of the  
22 California Penal Code, ENHANCEMENT FOR ONE PRIOR FELONY  
23 CONVICTION THAT PROHIBITS PROBATION, LIMITS CREDITS, REQUIRES  
24 CONSECUTIVE SENTENCING, AND MANDATES PRISON COMMITMENT, in that  
25 ALAMAR CYRIL HOUSTON was convicted of a prior felony as defined  
26 in Section 667(d) of the California Penal Code, and listed in  
27 Sections 667.5(c) and 1192.7(a) of the Penal Code, and Section  
28 707(b) of the Welfare and Institutions Code, to wit, a


1 conviction on May 30, 2001 for a violation of Section  
2 211/212.5 of the California Penal Code, in the County of  
3 Sacramento, Case No. 01F0836.

4  
5 Case Enhancement b : It is further alleged that ALAMAR  
6 CYRIL HOUSTON was previously convicted of a serious felony  
7 within the meaning of Section 667(a)(1) of the California Penal  
8 Code, ENHANCEMENT FOR HABITUAL CRIMINALS, in that ALAMAR CYRIL  
9 HOUSTON was convicted of a serious felony listed in Section  
10 1192.7 of the Penal Code, to wit, Section 211/212.5 of the  
11 California Penal Code, on May 30, 2001 in the County of  
12 Sacramento, Case No. 01F0836.

13  
14 Case Enhancement c : It is further alleged that during the  
15 commission of the felony charged in Count 0 ALAMAR CYRIL HOUSTON  
16 did proximately cause Bodily Injury to more than one victim, to  
17 wit, D.D., T.J., and J.J., within the meaning of Section 23558  
18 of the California Vehicle Code, ENHANCEMENT FOR MULTIPLE VICTIMS  
19 WHEN SECTION 23153 OF THE VEHICLE CODE OR SECTION 191.5 OR  
20 193(c)(3) OF THE PENAL CODE IS CHARGED.

21  
22 I declare under penalty of perjury that the foregoing is  
23 correct.

24 Executed on July 1, 2015, at Woodland, California.

25  
26   
27 \_\_\_\_\_  
28 Ryan Couzens/215818  
Deputy District Attorney