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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
RANCHO CUCAMONGA DISTRICT

JUN 20 2025

BY 
ANA ESTRADA, DEPUTY

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF SAN BERNARDINO

14 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

15 Plaintiff,

16 v.

17 **EVERON WINROY SHAW**

18 [DOB: 

19 Defendant.

Case No: **FWN 25002170**
**FELONY COMPLAINT FOR
ARREST WARRANT**

21 The Attorney General of the State of California, by this Felony Complaint, accuses
22 Defendant EVERON WINROY SHAW of the following felonies, which are connected in their
23 commission:

24 **COUNT 1**
25 **Dependent Adult Abuse**
Penal Code Section 368(b)(1)

26 On or about October 26, 2023, in the county of San Bernardino, Defendant EVERON
27 WINROY SHAW did, under circumstances and conditions likely to produce great bodily harm
28 and death, knowingly and willfully cause and permit *David M.*, a dependent adult, to suffer, and

1 inflicted thereon, unjustifiable physical pain and mental suffering and, having the care and
2 custody of said person, willfully caused and permitted him to be placed in a situation in which his
3 health was endangered, and knew and reasonably should have known that *David M.*, was a
4 dependent adult, in violation of Penal Code section 368, subdivision (b)(1), a felony.

5
6 **COUNT 2**
Assault with a Deadly Weapon
Penal Code Section 245(a)(1)
7

8 On or about October 26, 2023, in the county of San Bernardino, Defendant EVERON
9 WINROY SHAW, did willfully and unlawfully commit an assault upon the person of *David M.*,
10 with a deadly weapon and instrument, to wit: a bat, in violation of Penal Code section 245
11 subdivision (a)(1), a felony.

12 **Factors in Aggravation**
Penal Code Section 1170

13 As to Counts 1 and 2, it is further alleged, pursuant to Penal Code Section 1170,
14 subdivision (b), that victim *David M.*, was particularly vulnerable, as set forth in Rule of Court
15 4.421(a)(3).

16 As to Counts 1 and 2, it is further alleged, pursuant to Penal Code Section 1170,
17 subdivision (b), that Defendant EVERON WINROY SHAW took advantage of a position of trust
18 or confidence to commit the offense, as set forth in Rule of Court 4.421(a)(11).

19 **NOTICE:** The offenses alleged in Counts 1 and 3 are serious felonies within the meaning
20 of Penal Code section 1192.7, subdivision (c).

21 **NOTICE:** Pursuant to Evidence Code section 1101, subdivision (b), the People hereby give
22 notice that they intend to use what is known as 1101, subdivision (b) evidence to show "motive,
23 opportunity, intent, preparation, plan, knowledge, identity, absence of mistake or accident,"
24 and/or to attack the credibility of any witness. Evidence Code section 1101, subdivision (b).

25 **NOTICE:** Conviction of one or more of these offenses will require the defendant to
26 provide a DNA sample and print impressions pursuant to Penal Code sections 296 and 296.1.
27 Willful refusal to provide samples and impressions is a crime.

28 **NOTICE:** The People of the State of California intend to present evidence and to seek jury

1 findings regarding any and all applicable factors in aggravation, pursuant to Penal Code section
2 1170, subdivision (b), and *Cunningham v. California* (2007) 549 U.S. 270.

3 **NON-DISCLOSURE OF DISCOVERY**

4 Any and all investigation reports, attachments, records, documents, audio and video
5 recordings, photographs, diagrams, evidence, and other materials, provided in discovery in this
6 case may contain personal identifying information of victims or witnesses. Pursuant to Penal
7 Code section 1054.2, "no attorney shall disclose or permit to be disclosed to a defendant,
8 members of the defendant's family, or anyone else, the personal identifying information of a
9 victim or witness whose name is disclosed to the attorney" pursuant to section 1054.1,
10 subdivision (a), other than the name of the victim or witness, unless specifically permitted to do
11 so by the court after a hearing and a showing of good cause.

12 **REQUEST FOR DISCOVERY**

13 Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request
14 from defense counsel all materials and information whose disclosure is required by Penal Code
15 section 1054.3.

16 **DECLARATION**

17 I verify under information and belief, pursuant to Penal Code section 806, the foregoing is
18 true and correct.

19
20 Dated: June 16, 2025

Respectfully Submitted,

21
22 ROB BONTA
Attorney General of California

23
24 *Kathryn Fernandez*

25 KATHRYN FERNANDEZ
Deputy Attorney General

26 *Attorneys for the People of the*
27 *State of California*
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