

DAN DOW
DISTRICT ATTORNEY
STATE BAR # 237986
COUNTY OF SAN LUIS OBISPO
COURTHOUSE ANNEX, 4TH FLOOR
SAN LUIS OBISPO, CA 93408
TELEPHONE: (805) 781-5800

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO
DEPARTMENT 5

THE PEOPLE OF THE STATE OF
CALIFORNIA

Plaintiff,

vs.

ANDREW FREDERICK RODRIGUEZ
DOB: 11/22/1989
ID NO. D000438417
CII: A30490655

Defendant.

COURT CASE NO. 24F-06368
AMENDED COMPLAINT

DA CASE NO. 079-704955

Appearance Date: September 29,
2025

The District Attorney of San Luis Obispo County, California, hereby accuses the
above named defendant of the following criminal offenses:

Count 1

On or between September 10, 2024 to September 11, 2024, in the County of San Luis
Obispo, State of California, the crime of Involuntary Manslaughter in violation of Penal
Code section 192(b), a FELONY, was committed in that ANDREW FREDERICK
RODRIGUEZ did unlawfully, and without malice, kill Jonathan Campbell Perez, a human
being, in the commission of an unlawful act, not amounting to a felony; and in the

1 commission of a lawful act which might have produced death, in an unlawful manner, and
2 without due caution and circumspection.

3 **Personal Use of a Weapon Enhancement**

4 Penal Code section 12022(b)(1): Special Allegation - Use Of Deadly Weapon

5 It is further alleged as to Count 1 that in the commission and attempted commission
6 of the above offense, the said defendant, ANDREW FREDERICK RODRIGUEZ,
7 personally used a deadly and dangerous weapon(s), to wit, stabbing instrument or knife,
8 said use not being an element of the above offense, within the meaning of Penal Code
9 Section 12022(b)(1) and causing the above offense to be a serious felony within the
10 meaning of Penal Code section 1192.7(c)(23).

11 **Strike Prior**

12 It is further alleged, pursuant to Penal Code sections 667(d) and (e), and Penal
13 Code sections 1170.12(b) and (c), that defendant ANDREW FREDERICK RODRIGUEZ
14 has suffered the following prior conviction of a serious and/or violent felony:

Charge	S	Off. Date	Disp. Date	Sent. Date	Court #	Jurisdiction
Ca Penal Code Section 261(a)(4)	F	09-17-2009	07-22-2010	07-22-2010	2009034114	Ventura

17 **Strike Prior**

18 It is further alleged, pursuant to Penal Code sections 667(d) and (e), and Penal
19 Code sections 1170.12(b) and (c), that defendant ANDREW FREDERICK RODRIGUEZ
20 has suffered the following prior conviction of a serious and/or violent felony:

Charge	S	Off. Date	Disp. Date	Sent. Date	Court #	Jurisdiction
Ca Penal Code Section 289(d)	F	09-17-2009	07-22-2010	07-22-2010	2009034114	Ventura

23 **Strike Prior**

24 It is further alleged, pursuant to Penal Code sections 667(d) and (e), and Penal
25 Code sections 1170.12(b) and (c), that defendant ANDREW FREDERICK RODRIGUEZ
26 has suffered the following prior conviction of a serious and/or violent felony:

Charge	S	Off. Date	Disp. Date	Sent. Date	Court #	Jurisdiction
Ca Penal Code Section 459 (1 st)	F	09-17-2009	07-22-2010	07-22-2010	2009034114	Ventura

Nickel Prior

It is further alleged, pursuant to Penal Code section 667(a), that defendant ANDREW FREDERICK RODRIGUEZ has suffered the following prior conviction of a serious felony:

Charge	S	Off. Date	Disp. Date	Sent. Date	Court #	Jurisdiction
Ca Penal Code Section 261(a)(4)	F	09-17-2009	07-22-2010	07-22-2010	2009034114	Ventura

Nickel Prior

It is further alleged, pursuant to Penal Code section 667(a), that defendant ANDREW FREDERICK RODRIGUEZ has suffered the following prior conviction of a serious felony:

Charge	S	Off. Date	Disp. Date	Sent. Date	Court #	Jurisdiction
Ca Penal Code Section 289(d)	F	09-17-2009	07-22-2010	07-22-2010	2009034114	Ventura

It is further alleged pursuant to Penal Code Section 1170(b)(2) that one or more of the following factors in aggravation listed in California Rule of Court 4.421 may apply to the defendant(s) or to conduct of the defendant(s):

4.421(a)(1) The crime involved great violence, great bodily harm, threat of great bodily harm, and other acts disclosing a high degree of cruelty, viciousness and callousness.

4.421(a)(2) The defendant was armed with or used a weapon at the time of the commission of the crime.

4.421(a)(3) The victim was particularly vulnerable.

4.421(a)(4) The defendant induced others to participate in the commission of the crime and occupied a position of leadership and dominance of other participants in its commission.

1 4.421(a)(5) The defendant induced a minor to commit or assist in the commission of the
2 crime.

3 4.421(a)(6) The defendant threatened witnesses, unlawfully prevented and dissuaded
4 witnesses from testifying, suborned perjury, and in any other way illegally interfered with
5 the judicial process.

6 4.421(a)(7) The defendant is charged with other crimes for which consecutive sentences
7 can be imposed but for which concurrent sentences shall be imposed.

8 4.421(a)(8) The manner in which the crime was carried out indicates planning,
9 sophistication, or professionalism.

10 4.421(a)(9) The crime involved an attempted or actual taking or damage of great monetary
11 value.

12 4.421(a)(10) The crime involved a large quantity of contraband.

13 4.421(a)(11) The defendant took advantage of a position of trust and confidence to commit
14 the offense.

15 4.421(a)(12) The crime constitutes a hate crime under section 422.55 of the Penal Code
16 and no hate crime enhancements under section 422.75 of the Penal Code shall be
17 imposed and the crime is not subject to sentencing under section 1170.8 of the Penal
18 Code.

19 4.421(b)(1) The defendant has engaged in violent conduct that indicates a serious danger
20 to society.

21 4.421(b)(2) The defendant's prior convictions as an adult and sustained petitions in
22 juvenile delinquency proceedings are numerous and of increasing seriousness.

23 4.421(b)(3) The defendant has served a prior term in prison and county jail under section
24 1170(h).

25 4.421(b)(4) The defendant was on probation, mandatory supervision, post release
26 community supervision, and parole when the crime was committed.

1 4.421(b)(5) The defendant's prior performance on probation, mandatory supervision, post
2 release community supervision, and parole was unsatisfactory.

1 All of which is contrary to the statute in such cases made and provided, and against
2 the peace and dignity of the People of the State of California.

3 I declare that an investigation has been conducted to determine if said Defendant(s)
4 did commit the stated crime, which reports are attached hereto and incorporated herein by
5 reference, and that the facts therein show probable cause that the said Defendant(s) did
6 commit the crime. Your declarant requests the issuance of a Warrant of Arrest either if
7 said Defendant(s) do not appear voluntarily in response to an appearance letter, or if no
8 appearance letter was issued.

9 **Discovery Request:** Pursuant to Penal Code Section 1054.5(b), the People are
10 hereby informally requesting that defense counsel provide discovery to the people as
11 required by Penal Code Section 1054.3.

12 On this day September 25, 2025, in the County of San Luis Obispo, I certify and
13 declare under penalty of perjury that the foregoing is true and correct.

14 Dated: September 25, 2025

15 DAN DOW
16 DISTRICT ATTORNEY

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20 KIMBERLY DITTRICH
21 DEPUTY DISTRICT ATTORNEY

22 Upon review of the reports attached and incorporated herein by reference, I find sufficient
23 probable cause to warrant the defendant(s) continued detention.

24 Dated: _____
25 _____ Judge of the Superior Court
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SUMMARY PAGE					
Cnt	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC192(b)	2-3-4	Andrew Frederick Rodriguez	12022(b) = 1 year	
2	PC1170.12		Andrew Frederick Rodriguez		
3	PC1170.12		Andrew Frederick Rodriguez		
4	PC1170.12		Andrew Frederick Rodriguez		
5	PC667(a)		Andrew Frederick Rodriguez		
6	PC667(a)		Andrew Frederick Rodriguez		