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ATTORNEYS FOR THE PEOPLE

**FILED AND ENTERED/ENDORSED  
SAN FRANCISCO COUNTY**

**SUPERIOR COURT  
11/27/2024**

**CLERK OF COURT**

DocuSigned by:  
*Gordon Fong*

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**DEPUTY CLERK**

THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
CITY AND COUNTY OF SAN FRANCISCO

THE PEOPLE OF THE STATE OF CALIFORNIA  
Plaintiff,

v.

JAYDEN PATRICK  
Defendant(s).

FELONY COMPLAINT

CASE NUMBER:  
24022024

The Undersigned, being sworn says, on information and belief, that:

COUNT: I

The said defendant, JAYDEN PATRICK, did in the City and County of San Francisco, State of California, on or about the 25th day of November, 2024, commit the crime of MURDER, to wit: Violating Section **187(a)** of the Penal Code, a Felony, in that the said defendant did willfully, unlawfully, and with malice aforethought murder TAMYA WATSON, a human being.

The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c).

COUNT: II

The said defendant, JAYDEN PATRICK, did in the City and County of San Francisco, State of California, on or about the 25th day of November, 2024, commit the crime of MURDER, to wit: Violating Section **187(a)** of the Penal Code, a Felony, in that the said defendant did willfully, unlawfully, and with malice aforethought murder NEBIET BARHAM, a human being.

The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c).

COUNT: III

The said defendant, JAYDEN PATRICK, did in the City and County of San Francisco, State of California, on or about the 25th day of November, 2024, commit the crime of RECKLESS DRIVING, to wit: Violating Section **23103(a)** of the California Vehicle Code, a Felony, in that the said defendant did willfully and unlawfully drive a vehicle upon a highway in willful and wanton disregard for the safety of persons and property.

**ALLEGATION OF CAUSING INJURY PURSUANT TO VEHICLE CODE SECTION 23105(a)**

It is further alleged that the said defendant, JAYDEN PATRICK, while driving recklessly, caused injury, to wit: bone fracture, upon BRIEL BURRIS, other than the driver, within the meaning of Vehicle Code Section 23105(a).

COUNT: IV (ACTION NO. PP048832)

The said defendant, JAYDEN PATRICK, did in the City and County of San Francisco, State of California, on or about the 25th day of November, 2024, commit the crime of DRIVING UNDER THE INFLUENCE OF ALCOHOL CAUSING INJURY, to wit: Violating Section **23153(a)** of the Vehicle Code, a Felony, in that the said defendant did willfully and unlawfully while under the influence of an alcoholic beverage and a drug and under their combined influence, drive a vehicle and in so driving did an act forbidden by law, to wit: a violation of California Vehicle Code Sections 23103, 22450 and 22350, and neglected a duty imposed by law and the duty to exercise ordinary care at all times and maintain proper control of a vehicle which proximately caused bodily injury to BRIEL BURRIS.

**ALLEGATION OF GREAT BODILY INJURY PURSUANT TO PENAL CODE SECTION 12022.7(a)**

It is further alleged that in the commission of the above offense the defendant, JAYDEN PATRICK, personally inflicted great bodily injury upon BRIEL BURRIS, not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a), and also causing the above offense to become a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c).

**COUNT: V (ACTION NO. PP048833)**

The said defendant, JAYDEN PATRICK, did in the City and County of San Francisco, State of California, on or about the 25th day of November, 2024, commit the crime of DRIVING UNDER THE INFLUENCE OF ALCOHOL CAUSING INJURY, to wit: Violating Section **23153(a)** of the Vehicle Code, a Felony, in that the said defendant did willfully and unlawfully while under the influence of an alcoholic beverage and a drug and under their combined influence, drive a vehicle and in so driving did an act forbidden by law, to wit: a violation of California Vehicle Code Sections 23103, 22450 and 22350, and neglected a duty imposed by law and the duty to exercise ordinary care at all times and maintain proper control of a vehicle which proximately caused bodily injury to BELLA ESCOBAR.

**COUNT: VI (ACTION NO. PP048834)**

The said defendant, JAYDEN PATRICK, did in the City and County of San Francisco, State of California, on or about the 25th day of November, 2024, commit the crime of DRIVING UNDER THE INFLUENCE OF ALCOHOL CAUSING INJURY, to wit: Violating Section **23153(a)** of the Vehicle Code, a Felony, in that the said defendant did willfully and unlawfully while under the influence of an alcoholic beverage and a drug and under their combined influence, drive a vehicle and in so driving did an act forbidden by law, to wit: a violation of California Vehicle Code Sections 23103, 22450 and 22350, and neglected a duty imposed by law and the duty to exercise ordinary care at all times and maintain proper control of a vehicle which proximately caused bodily injury to KASEY ARRYAR.

**AS TO COUNTS 1 and 2:**

**CIRCUMSTANCES IN AGGRAVATION UNDER CALIFORNIA RULES OF COURT, RULE 4.421(a)(1)**

The crime involved great violence, great bodily harm, threat of great bodily harm, or other acts disclosing a high degree of cruelty, viciousness, or callousness, within the meaning of California Rules of Court Rule 4.421(a)(1).

**AS TO COUNTS 1 through 6:**

**CIRCUMSTANCES IN AGGRAVATION UNDER CALIFORNIA RULES OF COURT, RULE 4.421(a)(3)**

The victim, TAMYA WATSON, NEBIET BARHAM, BELLA ESCOBAR, KASEY ARRYAR AND BRIEL BURRIS, was particularly vulnerable, within the meaning of California Rules of Court Rule 4.421(a)(3).

**AS TO COUNTS 1 through 6:**

**CIRCUMSTANCES IN AGGRAVATION UNDER CALIFORNIA RULES OF COURT, RULE 4.421(b)(1)**

The defendant, JAYDEN PATRICK, engaged in violent conduct which indicates a serious danger to society, within the meaning of California Rules of Court Rule 4.421(b)(1).

Pursuant to Penal Code sections 1054 through 1054.7, the People request that, within fifteen (15) days, the defendant and/or his/her attorney disclose: (A) the names and addresses of persons, other than the defendant, he/she intends to call as witnesses at trial, together with any relevant written or recorded statements of those persons, or reports of the statements, of those persons including any reports or statements of experts made in connection with the case, and including the results of physical or mental examinations, scientific tests, experiments, or comparisons which the defendant intends to offer in evidence at the trial; (B) Any real evidence which the defendant intends to offer in evidence at the trial. This request is a continuing request, to cover not only all such material currently in existence, but all material which comes into existence to the conclusion of this case.

**MARSY'S LAW**

Information contained in the reports being distributed as discovery in this case may contain confidential information protected by Marsy's Law and the amendments to the California Constitution Section 28. Any victim(s) in any above referenced charge(s) is entitled to be free from intimidation, harassment, and abuse. It is unlawful for defendant(s), defense counsel, and any other person acting on behalf of the defendant(s) to use any information contained in the reports to locate or harass any victim(s) or the victim(s)'s family or to disclose any information that is otherwise privileged and confidential by law. Additionally, it is a misdemeanor violation of California Penal Code § 1054.2(a)(3) to disclose the address and telephone number of a victim or witness to a defendant, defendant's family member or anyone else. Note exceptions in California Penal Code § 1054.2(a)(2).

I state, declare, verify and certify under the penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California on November 27, 2024.

COURT NO. 24022024

DocuSigned by:

*Michael Baglin*

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Michael Baglin

11/27/2024