

TULARE COUNTY SUPERIOR COURT DISTRICT  
VISALIA DIVISION, STATE OF CALIFORNIA

THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff,

DA No. 22-0025816

vs.

Court No.

JOSE ZENDEJAS DOB: 01/03/1992  
AKA: JOSE ORIZABA ZENDEJAS DOB: 01/03/1997

**FELONY COMPLAINT**

BENITO MADRIGAL DOB: 01/07/2003  
AKA: BENITO BIRRUGIA MADRIGAL

Defendant(s).

The undersigned is informed and believes that:

**COUNT 1**

On or about June 24, 2022, in the County of Tulare, the crime of SALE/TRANSPORTATION/OFFER TO SELL CONTROLLED SUBSTANCE, in violation of HEALTH AND SAFETY CODE SECTION 11352(A), a Felony, was committed by JOSE ZENDEJAS & BENITO MADRIGAL, who did unlawfully transport, import into the State of California, sell, furnish, administer, and give away, and offer to transport, import into the State of California, sell, furnish, administer, and give away, and attempt to import into the State of California and transport a controlled substance, to wit, FENTANYL.

**COUNT 2**

On or about June 24, 2022, in the County of Tulare, the crime of TRANSPORT FOR SALE/NON-CONTIGUOUS COUNTY, in violation of HEALTH AND SAFETY CODE SECTION 11352(B), a Felony, was committed by JOSE ZENDEJAS & BENITO MADRIGAL, who did unlawfully transport COCAINE for sale from LOS ANGELES County to TULARE County, a non-contiguous county.

**SPEC ALLEG-PUNISHMENT BY QUANTITY**  
**ZENDEJAS & MADRIGAL**

It is further alleged as to count(s) 1-2 that the substance in the above charged offense exceeded 1 KILOGRAM by weight within the meaning of Health and Safety Code section 11370.4(a)(1).

**COUNT 3**

On or about June 24, 2022, in the County of Tulare, the crime of SALE/TRANSPORTATION/OFFER TO SELL CONTROLLED SUBSTANCE, in violation of HEALTH AND SAFETY CODE SECTION 11352(A), a Felony, was committed by JOSE ZENDEJAS & BENITO MADRIGAL, who did unlawfully transport, import into the State of California, sell, furnish, administer, and give away, and offer to transport, import into the State of California, sell, furnish, administer, and give away, and attempt to import into the State of California and transport a controlled substance, to wit, COCAINE.

**SPEC ALLEG-PUNISHMENT BY QUANTITY**  
**ZENDEJAS & MADRIGAL**

It is further alleged as to count(s) 1-2 that the substance in the above charged offense exceeded 1 KILOGRAM by weight within the meaning of Health and Safety Code section 11370.4(a)(1).

**COUNT 4**

On or about June 24, 2022, in the County of Tulare, the crime of FALSE COMPARTMENT ACTIVITY, in violation of HEALTH AND SAFETY CODE SECTION 11366.8(A), a Felony, was committed by JOSE ZENDEJAS & BENITO MADRIGAL, who did possess, use, and control a false compartment with the intent to store, conceal, smuggle and transport a controlled substance within the false compartment.

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Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

Pursuant to People v. Cunningham, the People hereby put the defendant on notice that the aggravated sentence may be sought in this case.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 4 COUNT(S).

Executed at VISALIA DIVISION, California, on 06/30/2022.



CHELSEA K WAYT  
DEPUTY DISTRICT ATTORNEY

Agency: TULARE COUNTY SHERIFF'S OFFICE

<u>DEFENDANT NAME</u>	<u>SEX</u>	<u>RACE</u>	<u>HGT</u>	<u>WGT</u>	<u>EYES</u>	<u>HAIR</u>	<u>COURT DATE</u>	<u>INTAKE STATUS</u>
Jose Zendejas	M	H	5'5	150	Brown	Black	07/21/22	WA
Benito Madrigal	M	H	5'10	165	Brown	Black	07/21/22	CI

COMPLAINT PROCESSED BY: JS