Defendant: Jonathan Santillan

Victim(s): Maria Saravia Flores and Jose Mendoza Flores

Court Decision: Jonathan Santillan appealed his convictions and sentences related to a gang-related home invasion resulting in the murder of an innocent couple, believed to be mistaken for a rival gang member. The appellate court remanded for a new sentencing hearing due to insufficient findings to support life without parole sentences and ordered further proceedings on a suppression motion.

Case facts:

On 5 January 2013, Maria Saravia Flores and Jose Mendoza Flores were shot to death in their home during a gang-related attack. The attackers kicked in the couple's front door and sprayed every room in the home with gunfire from an AK-47 rifle and a .45 caliber handgun. Mr. Flores was shot sixteen times while lying on the couch and Ms. Flores was shot seven times in the back and legs at the doorway to the kitchen.

The couple were not the intended targets of the shooting. They lived in a home previously occupied by a gang member named “Sancho.” Sancho had been the target of a previous shooting by a rival gang member named “Trigger,” who was accompanied by his brother, Moises, and two teenagers, Isrrael Vasquez and Defendant Jonathan Santillan.

At the time of this earlier shooting, Sancho refused to provide much information to law enforcement about his attackers. But after reports of the Floreses' killings, Sancho contacted law enforcement and told them he believed he was the intended victim. He explained that he had lived at that residence a year earlier, before the Floreses moved in, and “Trigger” had visited him when he lived there. Law enforcement contacted Trigger's girlfriend, who identified Moises, Vasquez, and Santillan as Trigger's associates, and informed police that they carried a .45 caliber handgun and an AK-47 rifle.

Police found Santillan and Vasquez in the attic of Vasquez's house and arrested them. After searching the attic, law enforcement also found an AK-47, a .45 caliber handgun, and several rounds of .45 caliber ammunition. The .45 caliber ammunition had scratch marks on the shell casings to obscure identifying information, and those scratch marks matched those found on casings at the Floreses' home and the earlier shooting involving Sancho.

On 15 January 2013, officers interrogated Santillan in four separate interviews over an eight-hour period. At the time, Santillan was fifteen years old. Santillan initially denied his involvement in both the Sancho shooting and the Floreses' killings, but later confessed to being present at the Sancho shooting. Santillan denied any involvement in the Floreses' killings, but he gave a detailed description of the murders and made a sketch of the Floreses' home based on information he claimed to have learned from Moises. Law enforcement videotaped each of the four interviews.

The State indicted Santillan on two counts of first degree murder, conspiracy to commit murder, first degree burglary, conspiracy to commit burglary, and possession of a firearm with altered serial number. At trial, the State sought to admit Santillan's videotaped interrogation and his sketch of the Floreses' home into evidence. Santillan moved to suppress this evidence on the ground that it was obtained in violation of his Sixth Amendment rights. The trial court denied the motion.

Over Santillan's objection, the trial court also admitted rap lyrics found in a notebook in Santillan's room. The lyrics describe someone “kick[ing] in the door” and “spraying” bullets with an AK-47.

The jury convicted Santillan on all charges. The trial court sentenced him to two consecutive sentences of life without parole and other, lesser sentences. Santillan timely appealed.