

**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF CONTRA COSTA**

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,

v.

SEGUNDO FORTUNATO COLLAZOS,  
*dob* 01/21/1955;  
Defendant.

Docket: 01-195521-0  
DA No: 0130991287

COMPLAINT - FELONY

Count 1) LC6425(a)  
Count 2) LC6425(a)

**COUNT 1 – VIOLATION LABOR STANDARD CAUSE DEATH/IMPAIRMENT TO EMPLOYEE**

The undersigned states, on information and belief, that Segundo Fortunato Collazos, Defendant, did commit a Felony, a violation of LC6425(a), VIOLATION LABOR STANDARD CAUSE DEATH/IMPAIRMENT TO EMPLOYEE, committed as follows:

On or about April 9, 2018 at San Ramon, in Contra Costa County, SEGUNDO FORTUNATO COLLAZOS, who was an employer having direction, management, control, or custody of any employment, place of employment, or of any other employee, did willfully violate Title 8 California Code of Regulation section 3328(a), an occupational safety and health standard, order, or special order, by allowing the following: utilize machinery and equipment, to wit: a Dosko Stump and Root Grinder to be used or operated under environmental conditions that were contrary to the manufacturer's recommendations by allowing an employee, Manuel Peralta to work within the danger zone of the cutting wheel, and said violation caused the death of Manuel Peralta.

**COUNT 2 – VIOLATION LABOR STANDARD CAUSE DEATH/IMPAIRMENT TO EMPLOYEE**

The undersigned states, on information and belief, that Segundo Fortunato Collazos, Defendant, did commit a Felony, a violation of LC6425(a), VIOLATION LABOR STANDARD CAUSE DEATH/IMPAIRMENT TO EMPLOYEE, committed as follows:

On or about April 9, 2018 at San Ramon, in Contra Costa County, SEGUNDO FORTUNATO COLLAZOS, who was an employer having direction, management, control, or custody of any employment, place of employment, or of any other employee, did willfully violate Title 8 California Code of Regulations section 3421(c)(2), an occupational safety and health standard, order, or special order, by failing to train and instruct an employee, Manuel Peralta, on the proper and safe use of a Dosko Stump and Root Grinder and said violation caused the death of Manuel Peralta.

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Complainant requests that the Defendant[s] be dealt with according to the law.

Dated: February 25, 2021, at Martinez, California

DIANA BECTON  
District Attorney



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Ryan A Morris  
Deputy District Attorney  
RAM/lj