


**COPY**

1 JEFF W. REISIG  
DISTRICT ATTORNEY OF YOLO COUNTY  
2 By: Michael Joseph Cabral/126660  
Assistant Chief Deputy District Attorney  
3 301 Second Street  
Woodland, California 95695  
4 Telephone: (530) 666-8180  
Entry No.: 194018  
5 Attorney for People

**FILED**  
YOLO SUPERIOR COURT

JUL 12 2013

3y   
Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF YOLO

11 THE PEOPLE OF THE STATE OF  
CALIFORNIA,

Dept.

Case No. 13002702

COMPLAINT

13 Plaintiff,

14 vs.

15 NICHOLAS ROBERT BOWEN,

16 WENYI XU

17 Defendant (s)

18  
19 I, the undersigned, say, on information and belief, that in  
20 the County of Yolo, State of California:

21 Count 1 : On or about July 10, 2013, NICHOLAS ROBERT BOWEN  
22 and WENYI XU did commit a FELONY, namely, a violation of Section  
23 182(a)(1) of the California Penal Code, CONSPIRACY TO COMMIT A  
24 MISDEMEANOR, in that NICHOLAS ROBERT BOWEN and WENYI XU did  
25 willfully and unlawfully conspire with another or others to  
26 commit a misdemeanor violation of Section 314.1 of the  
27 California Penal Code, and there did occur in furtherance of  
28 said conspiracy the following OVERT ACT(S):

1 Overt Act No.: 1 On or about July 10, 2013, NICHOLAS  
2 ROBERT BOWEN and WENYI XU were walking in Davis Community Park;

3 Overt Act No.: 2 On or about July 10, 2013, WENYI XU  
4 opened her dress and exposes her unclothed body;

5 Overt Act No.: 3 On or about July 10, 2013, NICHOLAS ROBERT  
6 BOWEN recorded WENYI XU as she opened her clothing;

7 Count 2 : On or about July 10, 2013, NICHOLAS ROBERT BOWEN  
8 did commit a MISDEMEANOR, namely, a violation of Section 314.2  
9 of the California Penal Code, LEWD AND OBSCENE EXHIBITION, in  
10 that NICHOLAS ROBERT BOWEN did willfully, unlawfully, and lewdly  
11 procure, counsel, and assist any person so as to expose such  
12 person, and take part in any model artist exhibition, and to  
13 make any other exhibition of such person to public view, and the  
14 view of any number of persons, such as was offensive to decency,  
15 and was adapted to excite to vicious and lewd thoughts and acts.

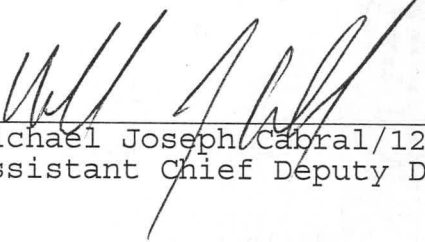
16 Count 3 : On or about July 10, 2013, WENYI XU did commit a  
17 MISDEMEANOR, namely, a violation of Section 314.1 of the  
18 California Penal Code, LEWD AND OBSCENE CONDUCT, in that WENYI  
19 XU did willfully, unlawfully, and lewdly expose WENYI XU's  
20 person, and the private parts thereof, in a public place, and in  
21 any place where there were present other persons to be offended  
22 and annoyed thereby.

23 Count 4 : On or about July 10, 2013, NICHOLAS ROBERT BOWEN  
24 and WENYI XU, did commit a MISDEMEANOR, namely, a violation of  
25 Section 647.6(a) of the California Penal Code, CHILD  
26 MOLESTATION, in that NICHOLAS ROBERT BOWEN and WENYI XU did  
27 willfully and unlawfully annoy or molest a child under the age  
28 of 18.

1 Count 5 : On or about July 10, 2013, NICHOLAS ROBERT BOWEN  
2 and WENYI XU did commit a MISDEMEANOR, namely, a violation of  
3 Section 647(a) of the California Penal Code, DISORDERLY CONDUCT  
4 - ENGAGING IN LEWD CONDUCT, in that NICHOLAS ROBERT BOWEN and  
5 WENYI XU did willfully and unlawfully solicit another to engage  
6 in and did engage in lewd and dissolute conduct in any public  
7 place and in any place open to the public and exposed to public  
8 view.

9 I declare under penalty of perjury that the foregoing is  
10 correct.

11 Executed on July 12, 2013, at Woodland, California.

12  
13   
14 \_\_\_\_\_  
15 Michael Joseph Cabral/126660  
16 Assistant Chief Deputy District Attorney  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28