

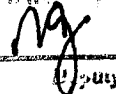
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5 Attorney for People

FILED
YOLO SUPERIOR COURT

MAR 16 2015

By



Deputy

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

11
12 THE PEOPLE OF THE STATE OF
13 CALIFORNIA,

Dept. 9

Case No. 15001239

COMPLAINT

14 Plaintiff,

15 vs.

16 SAMANTHA LEE GREEN

17 Defendant(s)

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

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25 Count 1 : On or about February 24, 2015, SAMANTHA LEE GREEN
26 did commit a FELONY, namely, a violation of Section 192(b) of
27 the California Penal Code, INVOLUNTARY MANSLAUGHTER, in that
28 SAMANTHA LEE GREEN did willfully and unlawfully kill a human

1 being, to wit, J.R. date of birth February 5, 2015, without
2 malice, in the commission of an unlawful act, not amounting to a
3 felony, and in the commission of a lawful act which might
4 produce death, in an unlawful manner, or without due caution and
5 circumspection.

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9 Count 2 : On or about February 24, 2015, SAMANTHA LEE GREEN
10 did commit a FELONY, namely, a violation of Section 273a(a) of
11 the California Penal Code, ~~ABUSING OR ENDANGERING HEALTH OF A~~
12 CHILD, in that SAMANTHA LEE GREEN did willfully and unlawfully,
13 under circumstances and conditions likely to produce great
14 bodily harm and death, cause and permit a child to suffer, and
15 SAMANTHA LEE GREEN did inflict thereon unjustifiable physical
16 pain and mental suffering, and having the care or custody of
17 said child SAMANTHA LEE GREEN did willfully cause and permit the
18 person and health of said child to be injured, and SAMANTHA LEE
19 GREEN did willfully cause and permit said child to be placed in
20 such a situation that the child's person and health was
21 endangered.

22 Count Enhancement 2a : It is further alleged that during
23 the commission of the felony charged above SAMANTHA LEE GREEN
24 did willfully, unlawfully, and personally inflict great bodily
25 injury upon a child under the age of five years in the
26 commission of a felony, within the meaning of Section 12022.7(d)
27 of the California Penal Code, INFLICTION OF GREAT BODILY INJURY
28 UPON A CHILD UNDER FIVE YEARS OF AGE DURING THE COMMISSION OF A

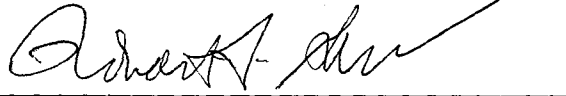
1 FELONY.

2 I declare under penalty of perjury that the foregoing is
3 correct.

4 Executed on March 4, 2015, at Woodland, California.

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Robert A. Gorman/176092
Supervising Deputy District Attorney

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