

**CASH BOND**

AGENCY#: PE180140020/RSDP

RECOMMENDED:

DEF#1 \$12,000,000.00

DEF#2 \$12,000,000.00

MICHAEL A. HESTRIN  
DISTRICT ATTORNEY

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

FEB 23 2018

K. Shepherd

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE  
(Riverside)

THE PEOPLE OF THE STATE OF CALIFORNIA,

D.A.# 368708

Plaintiff,

CASE NO. RIF1800348  
FIRST AMENDED FELONY  
COMPLAINT

v.

DAVID ALLEN TURPIN

DOB: 10/17/1961

BOOKING#: 201801856

LOUISE ANN TURPIN

AKA: LOUISE ANN ROBINETTE

DOB: 5/24/1968

BOOKING#: 201801857

Defendant(s).

COUNT 1

The undersigned, under penalty of perjury upon information and belief, declares: That the above named defendants, DAVID ALLEN TURPIN AND LOUISE ANN TURPIN, committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JANE DOE (JEN. T.).

COUNT 2

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JOHN DOE (JOS. T.).

COUNT 3

That the above named defendant(s) DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JANE DOE (JES. T.).

COUNT 4

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JOHN DOE (JON. T.).

COUNT 5

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JANE DOE (JOY T.).

COUNT 6

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JANE DOE (JUL. T.).

COUNT 7

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JANE DOE (JEA. T.).

COUNT 8

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JANE DOE (JOR. T.).

COUNT 9

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JOHN DOE (JAM. T.).

COUNT 10

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JANE DOE (JOA. T.).

COUNT 11

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JANE DOE (JOL. T.).

COUNT 12

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of section 206 of the Penal Code, a felony, in that on or about 6/11/2010 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully and with the intent to cause cruel or extreme pain and suffering for the purpose of revenge, extortion, persuasion, or for any sadistic purpose, inflicted great bodily injury upon the person of another, to wit: JANE DOE (JOLIS. T.).

### COUNT 13

That the above named defendant DAVID ALLEN TURPIN committed a violation of Penal Code section 288, subdivision (b), subsection (1), a felony, in that on or about 11/16/2012 through and including 11/15/2013, in the County of Riverside, State of California, the defendant did wilfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of JANE DOE (JOR. T.), a child under the age of fourteen years, by use of force, violence, duress, menace, and fear of immediate and unlawful bodily injury, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

### COUNT 14

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 368, subdivision (b), subsection (1), a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JANE DOE (JEN. T.), with knowledge that she was an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did wilfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered.

### COUNT 15

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 368, subdivision (b), subsection (1), a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JOHN DOE (JOS. T.), with knowledge that he was an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did wilfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered.

### COUNT 16

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 368, subdivision (b), subsection (1), a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JANE DOE (JES. T.), with knowledge that she was an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did wilfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered.

#### COUNT 17

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 368, subdivision (b), subsection (1), a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JOHN DOE (JON. T.), with knowledge that he was an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did wilfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered.

#### COUNT 18

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 368, subdivision (b), subsection (1), a felony, in that on or about 5/21/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JANE DOE (JOY T.), with knowledge that she was an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did wilfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered.

#### COUNT 19

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 368, subdivision (b), subsection (1), a felony, in that on or about 6/15/2016 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JANE DOE (JUL. T.), with knowledge that she was an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did wilfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered.

#### COUNT 20

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 368, subdivision (b), subsection (1), a felony, in that on or about 7/27/2017 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JANE DOE (JEA. T.), with knowledge that she was an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did wilfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered.

COUNT 21

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 1/15/2015 through and including 5/20/2015, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE (JOY T.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did wilfully cause and permit the person and health of said child to be injured and did wilfully cause and permit said child to be placed in such a situation that HER person and health was endangered.

COUNT 22

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 1/15/2015 through and including 6/14/2016, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE (JUL. T.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did wilfully cause and permit the person and health of said child to be injured and did wilfully cause and permit said child to be placed in such a situation that HER person and health was endangered.

COUNT 23

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 1/15/2015 through and including 7/26/2017, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE (JEA. T.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did wilfully cause and permit the person and health of said child to be injured and did wilfully cause and permit said child to be placed in such a situation that HER person and health was endangered.

COUNT 24

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE (JOR. T.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did wilfully cause and permit the person and health of said child to be injured and did wilfully cause and permit said child to be placed in such a situation that HER person and health was endangered.

COUNT 25

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JOHN DOE ( JAM. T.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did wilfully cause and permit the person and health of said child to be injured and did wilfully cause and permit said child to be placed in such a situation that HIS person and health was endangered.

COUNT 26

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 1/15/2015 through and including 1/14/2018 , in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE (JOA. T.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did wilfully cause and permit the person and health of said child to be injured and did wilfully cause and permit said child to be placed in such a situation that HER person and health was endangered.

COUNT 27

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 273a, subdivision (a), a felony , in that on or about 1/15/2015 through and including 1/14/2018 , in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE (JOL. T.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did wilfully cause and permit the person and health of said child to be injured and did wilfully cause and permit said child to be placed in such a situation that HER person and health was endangered.

COUNT 28

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 1/15/2015 through and including 1/14/2018 , in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE ( JOLIS. T.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did wilfully cause and permit the person and health of said child to be injured and did wilfully cause and permit said child to be placed in such a situation that HER person and health was endangered.

COUNT 29

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 3/20/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE (JAN. T.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did wilfully cause and permit the person and health of said child to be injured and did wilfully cause and permit said child to be placed in such a situation that HER person and health was endangered.

COUNT 30

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JANE DOE (JEN.T.).

COUNT 31

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JOHN DOE (JOS. T.).

COUNT 32

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JANE DOE (JES. T.).

COUNT 33

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JOHN DOE (JON. T.).

COUNT 34

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JANE DOE (JOY T.).



COUNT 35

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JANE DOE (JUL. T.).

COUNT 36

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JANE DOE (JEA. T.).

COUNT 37

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JANE DOE (JOR. T.).

COUNT 38

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JANE DOE (JAM. T.).

COUNT 39

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JANE DOE (JOA. T.).

COUNT 40

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018 in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JANE DOE (JOL. T.).

#### COUNT 41

That the above named defendants DAVID ALLEN TURPIN AND LOUISE ANN TURPIN committed a violation of Penal Code section 236, a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant(s) did wilfully and unlawfully, by violence, menace, fraud, and deceit, violate the personal liberty of JANE DOE (JOLIS. T.).

#### COUNT 42

That the above named defendant LOUISE ANN TURPIN committed a violation of Penal Code section 245, subdivision (a), subsection (4), a felony, in that on or about 1/15/2015 through and including 1/14/2018, in the County of Riverside, State of California, the defendant did willfully and unlawfully commit an assault upon JANE DOE (JOR. T.), by means of force likely to produce great bodily injury.

#### 1109 NOTICE

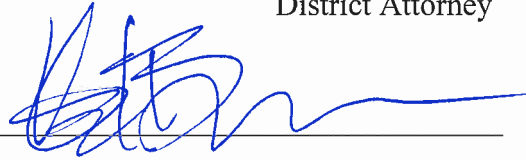
Pursuant to section 1109 of the Evidence Code, evidence of the defendant(s) commission of other acts of domestic violence may be admissible at trial in a criminal action in which the defendant(s) are accused of an offense involving domestic violence. The People hereby give notice of the People's intent to admit evidence of prior acts of domestic violence pursuant to Evidence Code section 1109. These incidents include the prior incident(s) described in the police report, chronological report, and/or tapes already provided, and other alleged incidents of abuse, which will be provided as they are obtained by the prosecution.

MARSY'S LAW

Information contained in the reports being distributed as discovery in this case may contain confidential information protected by Marsy's Law and the amendments to the California Constitution Section 28. Any victim(s) in any above referenced charge(s) is entitled to be free from intimidation, harassment, and abuse. It is unlawful for defendant(s), defense counsel, and any other person acting on behalf of the defendant(s) to use any information contained in the reports to locate or harass any victim(s) or the victim(s)'s family or to disclose any information that is otherwise privileged and confidential by law. Additionally, it is a misdemeanor violation of California Penal Code § 1054.2a(3) to disclose the address and telephone number of a victim or witness to a defendant, defendant's family member or anyone else. Note exceptions in California Penal Code § 1054.2a(a) and (2).

I declare under penalty of perjury upon information and belief under the laws of the State of California that the foregoing is true and correct.

Michael A. Hestrin  
District Attorney



Dated: February 8, 2018

By: Kevin H. Beecham  
Deputy District Attorney

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