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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF YOLO  
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10  
11 THE PEOPLE OF THE STATE OF  
CALIFORNIA,

12  
13 Plaintiff,

14 vs.

15 TED ALLEN HICKS,  
16 RYAN CHARLES MEARS

17 Defendant(s)

Dept. 1

Case No. 16007699

COMPLAINT

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 September 14, 2016, RYAN CHARLES  
22 MEARS and TED ALLEN HICKS did commit a FELONY, namely, a  
23 violation of Section 182(a)(1) of the California Penal Code,  
24 CONSPIRACY TO COMMIT SALES OF MARIJUANA, in that RYAN CHARLES  
25 MEARS and TED ALLEN HICKS did willfully and unlawfully conspire  
26 with another or others to commit a violation of Section Code  
27 number 11360(a)(2) of the California Health and Safety Code, and  
28 there did occur in furtherance of said conspiracy the following

1 OVERT ACT(S) :

2 1) Defendants and others formed Big Red Farms

3 2) Defendants and others obtained a permit from the State  
4 Water Resources Board for the purposes of cultivating marijuana

5 3) Defendants and others claimed to be a medical marijuana  
6 collective providing marijuana to legitimate patients in  
7 compliance with state law for the purposes of obtaining a  
8 operator identification number and a business license from Yolo  
9 County

10 4) Defendants obtained an operator identification number  
11 and a business license from Yolo County

12 5) Defendants contracted with Ravinder Tumber to cultivate  
13 marijuana on his property

14 6) Defendants paid Ravinder Tumber \$25,000 for the purpose  
15 of leasing one acre of land to grow marijuana

16 7) Defendants agreed to pay Ravinder Tumber an additional  
17 \$225,000 upon the harvest and sale of marijuana located on  
18 Ravinder Tumber's land

19 8) Defendants went to HempCon on April 17, 2016

20 9) Defendants set up a booth at HempCom

21 10) Defendants provided paperwork to attendees of HempCom  
22 purporting to be membership applications to Big Red Farms

23 11) Defendants offered free samples of marijuana in  
24 exchange for attendees filling out the purported applications

25 12) Defendants collected no less than 250 purported  
26 applications from HempCon attendees for the purpose of growing  
27 additional marijuana

28 13) Defendants planted no less than 1000 marijuana plants

1 on Ravinder Tumber's property

2 14) Defendants cultivated and tended to the marijuana  
3 throughout the growing season

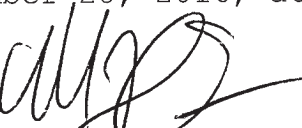
4 15) Defendants intended to make no less than \$1,000,000  
5 from the harvest of no less than 1000 plants

6 16) Defendants never made any arrangements to disperse  
7 marijuana to any of the attendees who filled out purported  
8 applications at HempCon

9 Count 2 : On or about September 14, 2016, RYAN CHARLES  
10 MEARS and TED ALLEN HICKS did commit a MISDEMEANOR, namely, a  
11 violation of Section 11358(c) of the California Health and  
12 Safety Code, CULTIVATION OF MARIJUANA, in that defendant did  
13 willfully and unlawfully plant, cultivate, harvest, dry, and  
14 process more than 6 living marijuana plants.

15 I declare under penalty of perjury that the foregoing is  
16 correct.

17 Executed on December 28, 2016, at Woodland, California.

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20 Michael Vroman/247763  
21 Deputy District Attorney  
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