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Entry No.: 236729
5 Attorney for People

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

11
12 THE PEOPLE OF THE STATE OF
13 CALIFORNIA,

Dept. 1

Case No. 17000998

COMPLAINT

14 Plaintiff,

15 vs.

16 FRANK TALLIESEN REES

17 Defendant(s)

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

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24 Count 1 : On or about February 23, 2015, FRANK TALLIESEN
25 REES did commit a FELONY, namely, a violation of Section 192(b)
26 of the California Penal Code, INVOLUNTARY MANSLAUGHTER, in that
27 FRANK TALLIESEN REES did willfully and unlawfully kill a human
28 being, to wit, J.R., date of birth February 9, 2015, without

1 malice, in the commission of an unlawful act, not amounting to a
2 felony, and in the commission of a lawful act which might
3 produce death, in an unlawful manner, or without due caution and
4 circumspection.

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9 Count 2 : On or about February 23, 2015, FRANK TALLIESEN
10 REES did commit a FELONY, namely, a violation of Section 273a(a)
11 of the California Penal Code, ABUSING OR ENDANGERING HEALTH OF A
12 CHILD, in that FRANK TALLIESEN REES did willfully and
13 unlawfully, under circumstances and conditions likely to produce
14 great bodily harm and death, cause and permit a child to suffer,
15 and FRANK TALLIESEN REES did inflict thereon unjustifiable
16 physical pain and mental suffering, and having the care or
17 custody of said child FRANK TALLIESEN REES did willfully cause
18 and permit the person and health of said child to be injured,
19 and FRANK TALLIESEN REES did willfully cause and permit said
20 child to be placed in such a situation that the child's person
21 and health was endangered.

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25 Count 3 : On or about February 23, 2015, FRANK TALLIESEN
26 REES did commit a FELONY, namely, a violation of Section
27 11379(a) of the California Health and Safety Code, ADMINISTERING
28 CONTROLLED SUBSTANCE, in that FRANK TALLIESEN REES did willfully

1 and unlawfully administer a controlled substance, to wit,
2 methamphetamine.

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

5 Executed on February 17, 2017, at Woodland, California.

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8 Robert A. Gorman/176092
9 Supervising Deputy District Attorney
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