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SUPERIOR COURT-STOCKTON

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DEPUTY

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8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN

9 The People of the State of California,  
10  
11 Plaintiff,

12 v.

13 JASON ROSS GILLEY

14  
15  
16  
17 Defendant (s).

No. SP11-27831  
SPD CASE  
DA Case: CR-2011-4011244  
  
COMPLAINT

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

20  
21 **COUNT 1: WILLFUL, DELIBERATE, PREMEDITATED MURDER PC.187(A)<F22** On  
22 or about August 7, 2011, in the County of San Joaquin, California,  
23 JASON ROSS GILLEY, did commit the crime of WILLFUL, DELIBERATE,  
24 PREMEDITATED MURDER, in violation of Section 187(a) of the Penal  
25 Code, a FELONY, who at the time and place last aforesaid did  
26 willfully, unlawfully, and with malice aforethought murder DALENE  
27

1 CARLSON, a human being. It is further alleged that the aforesaid  
2 murder was committed willfully, deliberately and with premeditation  
3 within the meaning of Penal Code Section 664(a); and is a serious  
4 felony pursuant to Penal Code Section 1192.7(c).

5  
6 **SPECIAL CIRCUMSTANCE: KIDNAPPING PC.190.2(A)(17)(B)** It is further  
7 alleged that the murder of DALENE CARLSON was committed by  
8 defendant, JASON ROSS GILLEY, while the said defendant was engaged  
9 in the commission of the crime of Kidnapping in violation of Penal  
10 Code Section 207 and 209.

11  
12  
13 **SPECIAL CIRCUMSTANCE: RAPE PC.190.2(A)(17)(C)** It is further alleged  
14 that the murder of DALENE CARLSON was COMMITTED by JASON ROSS  
15 GILLEY while the said defendant was ENGAGED IN THE COMMISSION OF  
16 the crime of rape, a violation of Penal Code Section 261.

17  
18 **INTENTIONAL & PERSONAL DISCHARGE OF A FIREARM - GBI (25 TL)**  
19 **PC.12022.53(D)<F3** It is further alleged that in the commission of  
20 the foregoing offense, the defendant JASON ROSS GILLEY  
21 intentionally and personally discharged a firearm, to-wit: HANDGUN  
22 and proximately caused great bodily injury, as defined in Penal  
23 Code Section 12022.7, to a person other than an accomplice, to-wit:  
24 DALENE CARLSON within the meaning of Section 12022.53(d) (and  
25 12022.53(c) and 12022.53(b) and or 12022.53(e)) of the Penal Code.  
26  
27  
28

1 If the above-named defendant(s) is/are presently on probation in  
2 San Joaquin County, any evidence presented at a preliminary hearing  
3 in the instant case will be used not only as a basis for a holding  
4 order in this case but also as evidence of a violation of probation  
5 and, at any formal hearing on that violation of probation, the  
6 People will move the transcript of the preliminary hearing into  
7 evidence as a basis for the violation.  
8

9  
10 Pursuant to Penal Code Section 1054.5(b), the People hereby  
11 informally request that the defendant and his/her attorney disclose  
12 to the People all information and materials described in Penal Code  
13 Section 1054.3.

14  
15 I declare under penalty of perjury that the foregoing is true and  
16 correct except for those things stated on information and belief  
17 and those I believe to be true.  
18

19 Executed on 10/21/2011, at STOCKTON, California.  
20

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