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1 JEFF W. REISIG
DISTRICT ATTORNEY OF YOLO COUNTY
2 By: Jeff W. Reisig/182205
District Attorney
3 301 Second Street
Woodland, California 95695
4 Telephone: (530) 666-8180
Entry No.: 197893
5 Attorney for People

FILED
YOLO SUPERIOR COURT

JAN 03 2014

3y 
Deputy

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

11 THE PEOPLE OF THE STATE OF
12 CALIFORNIA,

Dept. 9 Case No. 14000014
COMPLAINT

13 Plaintiff,

14 vs.

15 WILLIAM CARL GARDNER III

16 Defendant

17
18 I, the undersigned, say, on information and belief, that in
19 the County of Yolo, State of California:

20 Count 1 : On or about November 18, 2013, WILLIAM CARL
21 GARDNER III did commit a FELONY, namely, a violation of Section
22 187(a) of the California Penal Code, MURDER, in that WILLIAM
23 CARL GARDNER III did willfully and unlawfully kill a human
24 being, to wit, L.P., with malice aforethought.

25 Count Enhancement 1a : It is further alleged that during
26 the commission or attempted commission of the felony charged
27 above, WILLIAM CARL GARDNER III did willfully, unlawfully,
28 intentionally, and personally discharge a firearm, and

1 proximately cause death, within the meaning of Section
2 12022.53(d) of the California Penal Code, INTENTIONAL AND
3 PERSONAL DISCHARGE OF FIREARM CAUSING DEATH.

4 Count Enhancement 1b : It is further alleged that at the
5 time of the commission of offense charged in Count 1, WILLIAM
6 CARL GARDNER III was released from custody on bail or own
7 recognizance for a pending felony offense, within the meaning of
8 Section 12022.1(b) of the California Penal Code, ENHANCEMENT FOR
9 FELONY COMMITTED WHILE RELEASED ON BAIL OR RECOGNIZANCE.

10 Count Enhancement 1c : It is also alleged that defendant is
11 subject to a SPECIAL CIRCUMSTANCE within the meaning of Section
12 190.2(a)(15) of the California Penal Code in that defendant
13 intentionally killed the victim, L.P., by means of lying in
14 wait.

15 Count 2 : On or about November 15, 2013, to November 18,
16 2013, WILLIAM CARL GARDNER III did commit a FELONY, namely, a
17 violation of Section 646.9(c) of the California Penal Code,
18 STALKING AFTER HAVING BEEN CONVICTED OF FELONY STALKING, in that
19 WILLIAM CARL GARDNER III did willfully, maliciously, and
20 repeatedly follow and harass another person, to wit, L.P. and
21 did make a credible threat with the intent to place said person
22 in reasonable fear for that person's safety and for the safety
23 of that person's immediate family and that said stalking
24 occurred after WILLIAM CARL GARDNER III had been convicted of
25 any felony violation of Section 273.5 of the California Penal
26 Code on March 13, 2013, in the County of Sacramento.

27 Count Enhancement 2a : It is further alleged that at the
28 time of the commission of offense charged in Count 2, WILLIAM

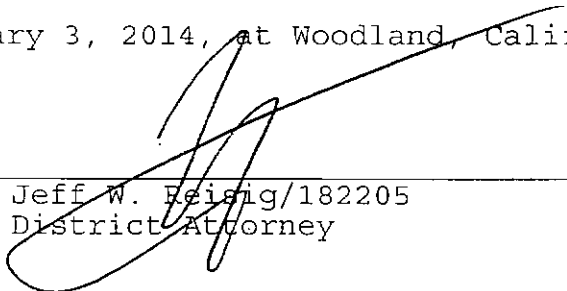
1 CARL GARDNER III was released from custody on bail or own
2 recognizance for a pending felony offense, within the meaning of
3 Section 12022.1(b) of the California Penal Code, ENHANCEMENT FOR
4 FELONY COMMITTED WHILE RELEASED ON BAIL OR RECOGNIZANCE.

5 Count 3 : On or about November 18, 2013, WILLIAM CARL
6 GARDNER III did commit a FELONY, namely, a violation of Section
7 29800(a)(1) of the California Penal Code, POSSESSION OF FIREARM
8 BY PERSON PREVIOUSLY CONVICTED OF A FELONY, in that WILLIAM CARL
9 GARDNER III did willfully and unlawfully own, purchase, receive,
10 or possess and have under WILLIAM CARL GARDNER III's custody and
11 control any firearm after WILLIAM CARL GARDNER III had been
12 previously convicted of a felony under the laws of the State of
13 California, the United States or any other state, government, or
14 country, or of an offense enumerated in subdivision (a), (b), or
15 (d) of Section 23515

16 Count Enhancement 3a : It is further alleged that at the
17 time of the commission of offense charged in Count 3, WILLIAM
18 CARL GARDNER III was released from custody on bail or own
19 recognizance for a pending felony offense, within the meaning of
20 Section 12022.1(b) of the California Penal Code, ENHANCEMENT FOR
21 FELONY COMMITTED WHILE RELEASED ON BAIL OR RECOGNIZANCE.

22 I declare under penalty of perjury that the foregoing is
23 correct.

24 Executed on January 3, 2014, at Woodland, California.

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26
27 
28 Jeff W. Reisig/182205
District Attorney