1 2 3 4 5 6 7	KAMALA D. HARRIS Attorney General of California STEVEN D. MUNI Deputy Attorney General State Bar No. 073567 1425 River Park Drive, Suite 300 Sacramento, CA 95815-4524 Telephone: (916) 263-1442 Fax: (916) 274-2929 E-mail: Steven.Muni@doj.ca.gov Attorneys for Plaintiff
8	SUPERIOR COURT OF THE STATE OF CALIFORNIA
9	COUNTY OF SACRAMENTO
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12	PEOPLE OF THE STATE OF Case No. 13F00783
13	CALIFORNIA, FELONY COMPLAINT
14	Plaintiff,
15	<b>v.</b>
16	SILVIA CATA,
17	\$ 300,000 Defendant.
18	
19	The People of the State of California hereby allege that in the County of Sacramento, State
20	of California, and elsewhere, and before the making or filing of this felony complaint, the above-
21	named defendant did commit the following criminal offenses:
22	COUNT 1
23	Penal Code section 368(b)(1) – Felony [2, 3, or 4 years]
24	On or about and between June 1, 2012 to June 19, 2012, in the County of Sacramento,
25	Defendant SILVIA CATA did, under circumstances and conditions likely to produce great bodily
26	harm and death, knowingly and willfully cause and permit the victim, Georgia H., age 88, an
27	elder and dependent adult, to suffer and inflicted thereon, unjustifiable physical pain and mental
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1	suffering and, having had the care and custody of said person, willfully caused and permitted her
2	to be placed in a situation in which her health was endangered, and reasonably knew and
3	reasonably should have known that said person, Georgia H., was an elder and dependent adult, in
4	violation of section 368, subdivision (b)(1) of the California Penal Code, a felony.
5	[Special Allegation, Elder or Dependant Adult Abuse, Infliction of Injury - +5 Years]
6	It is further alleged pursuant to section 368(b)(2), that said victim, age 88 years, suffered
7	great bodily injury.
8	[Special Allegation, Elder or Dependent Adult Abuse, Resulting in Death - + 7 Years]
9	It is further alleged pursuant to section 368(b)(3), that the defendant SILVA CATA
10	proximately caused the death of said victim, age 88 years.
11	COUNT 2
12	Penal Code Section 192(b) – Felony [2, 3, or 4 Years] [Involuntary Manslaughter]
13	From on or about June 1, 2012, to on or about June 19, 2012, defendant SILVIA CATA did
14	unlawfully and without malice, kill Georgia H., a human being, in the commission of an unlawful
15	act, not amounting to a felony, and in the commission of a lawful act which might have produced
16	death, in an unlawful manner, and without due caution and circumspection.
17	I declare under penalty of perjury, on information and belief, pursuant to the laws of the
18	State of California, that the foregoing is true and correct.
19	Dated: January 28, 2013 Respectfully Submitted,
20	KAMALA D. HARRIS Attorney General of California
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23	STEVEN D. MUNI
24	Deputy Attorney General Attorneys for Plaintiff
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1	REQUEST FOR DISCOVERY
2	Pursuant to Penal Code section 1054.5, subdivision (b), the People request from
3	defendants and defense counsel all materials and information required to be disclosed to the
4	prosecution by the defense under the authority of penal Code section 1054.3, including the
5	following:
6	1. The names and addresses of persons, other than the defendant, whom the
7	defendant intends to call as witnesses at trial. [Pen. Code § 1054.3, subd. (a).]
8	2. Any relevant written or recorded statements of persons whom the defendant
9	intends to call as witnesses at trial. [Pen. Code § 1054.3 subd. (a).]
10	3. Any reports of the statements of persons whom the defendant intends to call as
11	witnesses at trial. [Pen. Code § 1054.3 subd. (a).]
12	4. Any reports or statements of experts made in connection with the case. [Pen. Code
13	§ 1054.3 subd. (a).]
14	5. Any results of physical or mental examinations, scientific tests, experiments or
15	comparisons which the defendant intends to offer in evidence at the trial. [Pen. Code § 1054.3
16	subd. (a).]
17	6. The opportunity to view "[a]ny real evidence which the defendant intends to offer
18	in evidence at the trial." [Pen. Code § 1054.3 subd. (a).]
19	This is a continuing request for the above information. If the information becomes
20	available at a future time, the prosecution, by this request, asks that it be immediately disclosed to
21	the prosecution.
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1	HOLDING ORDER
2	Defendant SILVIA CATA.
3	Based on the evidence at the preliminary hearing, it appears that the following
4	offenses charged in the above Complaint have been committed and there is sufficient cause to
5	believe Defendant SILVIA CATA is guilty of these offenses.
6	Defendant has waived preliminary hearing of the offenses charged in the above
7	Complaint.
8	Exceptions/Additions/Conditions:
9	
10	IT IS ORDERED, pursuant to Penal Code section 368, subdivision (b)(1), that Defendant
11	is held to answer in Superior court to the following offenses:
12	COUNT CHARGE CHARGES RANGE
13	1Penal Code section 368, subdivision (b)(1)+5 Years
14	Elder or Dependent Adult Abuse, Infliction of Injury
15	2 Penal Code section 368, subdivision (b)(1) +7 Years Elder or Dependent Adult Abuse, Resulting in Death
16	In my capacity as Judge of the Superior court, I deem the within Complaint to be the
17	Information and order it filed as such in the Superior Court.
18	Dated this day of, 2013
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21	JUDGE OF THE SUPERIOR COURT
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