

**FILED**

Date 3-17-20

Kimberly Flener

By *[Signature]*, Deputy  
Superior Court of California, County of Butte

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF BUTTE

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY

Defendant(s).

No.

**20CF01422**

INDICTMENT

The Grand Jury of the County of Butte, State of California, hereby alleges that:

COUNT 1

On or about November 8, 2018, in the above named Judicial District, the crime of **UNLAWFULLY CAUSING A FIRE, in violation of PENAL CODE SECTION 452, a Felony** , was committed by PACIFIC GAS AND ELECTRIC COMPANY who did unlawfully cause a fire that caused to be burned, any structure, forest land and property.

**SPECIAL ALLEGATION – GREAT BODILY INJURY TO FIREFIGHTER**

It is further alleged, pursuant to Penal Code section 452.1(a)(2) as to Count 1, that the following aggravating factor exists: A firefighter suffered great bodily injury as a result.

1                   **SPECIAL ALLEGATION – MULTIPLE GREAT BODILY INJURIES**

2 It is further alleged, pursuant to Penal Code section 452.1(a)(3) as to Count 1, that the following  
3 aggravating factor exists: The defendant(s) proximately caused great bodily injury to more than one  
4 victim in any single violation of Section 452.

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6                   **SPECIAL ALLEGATION – MULTIPLE STRUCTURES BURNED**

7 It is further alleged, pursuant to Penal Code section 452.1(a)(4) as to Count 1, that the following  
8 aggravating factor exists: The defendant(s) proximately caused approximately 18,804 structures to  
9 burn.

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11                   COUNT 2

12 On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY  
13 MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by  
14 PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires,  
15 and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and  
16 equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical  
17 lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill  
18 **Joyce Acheson**, a human being.

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20                   COUNT 3

21 On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY  
22 MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by  
23 PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires,  
24 and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and  
25 equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical  
26 lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill  
27 **Herbert Alderman**, a human being.

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COUNT 4

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Teresa Ammons**, a human being.

COUNT 5

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Rafaela Andrade**, a human being.

COUNT 6

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Carol Arrington**, a human being.

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COUNT 7

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Julian Binstock**, a human being.

COUNT 8

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **David Bradburd**, a human being.

COUNT 9

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Cheryl Brown**, a human being.

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COUNT 10

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Larry Brown**, a human being.

COUNT 11

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Richard Brown**, a human being.

COUNT 12

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Andrew Burt**, a human being.

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COUNT 13

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Joanne Caddy**, a human being.

COUNT 14

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Barbara Carlson**, a human being.

COUNT 15

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Vincent Carota**, a human being.

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COUNT 16

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Dennis Clark, Jr.**, a human being.

COUNT 17

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Evelyn Cline**, a human being.

COUNT 18

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **John Digby**, a human being.

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COUNT 19

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice,, kill **Gordon Dise**, a human being.

COUNT 20

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Paula Dodge**, a human being.

COUNT 21

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Randall Dodge**, a human being.

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COUNT 22

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Andrew Downer**, a human being.

COUNT 23

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Robert Duvall**, a human being.

COUNT 24

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Paul Robert Ernest**, a human being.

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COUNT 25

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Rose Farrell**, a human being.

COUNT 26

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Jesus Fernandez**, a human being.

COUNT 27

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Jean Forsman**, a human being.

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COUNT 28

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Ernest Foss, Jr.**, a human being.

COUNT 29

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Elizabeth Gaal**, a human being.

COUNT 30

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Sally Gamboa**, a human being.

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COUNT 31

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **James Garner**, a human being.

COUNT 32

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Richard Garrett**, a human being.

COUNT 33

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **William Godbout**, a human being.

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COUNT 34

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Shirley Haley**, a human being.

COUNT 35

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Dennis Hanko**, a human being.

COUNT 36

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Anna Hastings**, a human being.

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COUNT 37

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Jennifer Hayes**, a human being.

COUNT 38

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Christina Heffern**, a human being.

COUNT 39

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Ishka Heffern**, a human being.

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COUNT 40

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Matilde Heffern**, a human being.

COUNT 41

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Louis Herrera**, a human being.

COUNT 42

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Evva Holt**, a human being.

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COUNT 43

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **TK Huff**, a human being.

COUNT 44

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Gary Hunter**, a human being.

COUNT 45

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **James Kinner**, a human being.

COUNT 46

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Dorothy Lee-Herrera**, a human being.

COUNT 47

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Warren Lessard**, a human being.

COUNT 48

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Dorothy Mack**, a human being.

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COUNT 49

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Sara Magnuson**, a human being.

COUNT 50

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Joanne Malarkey**, a human being.

COUNT 51

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **John Malarkey**, a human being.

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COUNT 52

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Christopher Maltby**, a human being.

COUNT 53

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **David Marbury**, a human being.

COUNT 54

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Deborah Morningstar**, a human being.

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COUNT 55

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Helen Pace**, a human being.

COUNT 56

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Joy Porter**, a human being.

COUNT 57

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Beverly Powers**, a human being.

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COUNT 58

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Robert Quinn**, a human being.

COUNT 59

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Joseph Rabetoy**, a human being.

COUNT 60

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Forrest Rea**, a human being.

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COUNT 61

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Vernice Regan**, a human being.

COUNT 62

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Ethel Riggs**, a human being.

COUNT 63

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Lolene Rios**, a human being.

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COUNT 64

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Gerald Rodrigues**, a human being.

COUNT 65

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Frederick Salazar**, a human being.

COUNT 66

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Phyllis Salazar**, a human being.

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COUNT 67

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Sheila Santos**, a human being.

COUNT 68

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Ronald Schenk**, a human being.

COUNT 69

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Berniece Schmidt**, a human being.

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COUNT 70

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **John Sedwick**, a human being.

COUNT 71

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Don Shores**, a human being.

COUNT 72

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Kathy Shores**, a human being.

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COUNT 73

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Judith Sipher**, a human being.

COUNT 74

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Larry Smith**, a human being.

COUNT 75

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Russell Stewart**, a human being.

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COUNT 76

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Victoria Taft**, a human being.

COUNT 77

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Shirlee Teays**, a human being.

COUNT 78

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Joan Tracy**, a human being.

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COUNT 79

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **John "Unknown"**, a human being.

COUNT 80

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Ellen Walker**, a human being.

COUNT 81

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Donna Ware**, a human being.

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COUNT 82

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Isabel Webb**, a human being.

COUNT 83

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Marie Wehe**, a human being.

COUNT 84

On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires, and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill **Kimberly Wehr**, a human being.

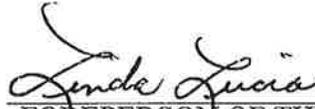
COUNT 85

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2 On or about November 8, 2018, in the above named Judicial District, the crime of INVOLUNTARY  
3 MANSLAUGHTER, in violation of PENAL CODE SECTION 192(b), a Felony , was committed by  
4 PACIFIC GAS AND ELECTRIC COMPANY, who had a legal duty to the public to avoid wildfires,  
5 and failed to perform that legal duty by recklessly failing to maintain and operate its electrical lines and  
6 equipment in a manner that would minimize the risk of catastrophic wildfires posed by those electrical  
7 lines and equipment, resulting in the Camp Fire; and therefore did unlawfully, and without malice, kill  
8 **David Young**, a human being.

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11 THIS INDICTMENT CONSISTS OF 85 COUNT(S).

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13 "A TRUE BILL"

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16 FOREPERSON OF THE GRAND JURY  
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