

1 TORI VERBER SALAZAR  
District Attorney  
2 San Joaquin County  
State Bar No. 213636  
3 By: Kathy A. Murray  
Deputy District Attorney  
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5 Stockton, CA 95202

6 209.468.2400, Fax 209.465.0371

7 Attorneys for Plaintiff

8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN

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

11 v.

12  
13 LYLE BURGESS  
14 CR-2016-0015689

15  
16  
17 Defendant(s).

FILED  
SUPERIOR COURT-STOCKTON

2017 NOV -6 AM 9:38

ROSA JUNQUEIRO, CLERK

BY *[Signature]*  
DEPUTY

No. SO16-30623  
SO CASE  
DA Case: CR-2016-4133561  
INFORMATION

CASA

18  
19 The said defendant(s) is/are accused by the District Attorney of  
20 the County of SAN JOAQUIN of the State of California, by this  
21 Information, of the following crime(s):

22 **COUNT 1: LEWD ACTS UPON A CHILD PC.288(A)**

23 On or about October 12, 2015 - November 12, 2016, in the County of  
24 San Joaquin, California, LYLE BURGESS, did commit the crime of LEWD  
25 ACT UPON A CHILD, in violation of Section 288(a) of the Penal Code,  
26 a FELONY, who at the time and place last aforesaid, did willfully,  
27

1 unlawfully, and lewdly commit a lewd and lascivious act upon and  
2 with the body and certain parts and members thereof of JANE H. DOE  
3 (DOB 10/12/2010) , a child under the age of fourteen years, with  
4 the intent of arousing, appealing to, and gratifying the lust,  
5 passions, and sexual desires of the said defendant(s) and the said  
6 child. It is further alleged that the above offense is a serious  
7 felony within the meaning of Penal Code Section 1192.7(c)(6).

8 NOTICE: Conviction of this offense will require you to register  
9 pursuant to Penal Code Section 290. Willful failure to register is  
10 a crime. NOTE: Touched Vagina, First Time.  
11

12  
13 For a further and separate cause of complaint, being a different  
14 offense from but connected in its commission with the charge(s)  
15 above, complainant further complains and says:  
16

17 **COUNT 2: LEWD ACTS UPON A CHILD PC.288 (A)**

18 On or about October 12, 2015 - November 12, 2016, in the County of  
19 San Joaquin, California, LYLE BURGESS, did commit the crime of LEWD  
20 ACT UPON A CHILD, in violation of Section 288(a) of the Penal Code,  
21 a FELONY, who at the time and place last aforesaid, did willfully,  
22 unlawfully, and lewdly commit a lewd and lascivious act upon and  
23 with the body and certain parts and members thereof of JANE H. DOE  
24 (DOB 10/12/2010) , a child under the age of fourteen years, with  
25 the intent of arousing, appealing to, and gratifying the lust,  
26 passions, and sexual desires of the said defendant(s) and the said  
27

1 child. It is further alleged that the above offense is a serious  
2 felony within the meaning of Penal Code Section 1192.7(c)(6).

3 NOTICE: Conviction of this offense will require you to register  
4 pursuant to Penal Code Section 290. Willful failure to register is  
5 a crime. NOTE: Touched Vagina, Last Time.

6  
7 For a further and separate cause of complaint, being a different  
8 offense from but connected in its commission with the charge(s)  
9 above, complainant further complains and says:  
10

11  
12 **COUNT 3: LEWD ACTS UPON A CHILD PC.288(A)**

13 On or about November 11, 2016, in the County of San Joaquin,  
14 California, LYLE BURGESS, did commit the crime of LEWD ACT UPON A  
15 CHILD, in violation of Section 288(a) of the Penal Code, a FELONY,  
16 who at the time and place last aforesaid, did willfully,  
17 unlawfully, and lewdly commit a lewd and lascivious act upon and  
18 with the body and certain parts and members thereof of JANE H. DOE  
19 (DOB 10/12/2010) , a child under the age of fourteen years, with  
20 the intent of arousing, appealing to, and gratifying the lust,  
21 passions, and sexual desires of the said defendant(s) and the said  
22 child. It is further alleged that the above offense is a serious  
23 felony within the meaning of Penal Code Section 1192.7(c)(6).

24  
25 NOTICE: Conviction of this offense will require you to register  
26 pursuant to Penal Code Section 290. Willful failure to register is  
27 a crime. NOTE: In Calaveras County - Touched Buttocks  
28

1 For a further and separate cause of complaint, being a different  
2 offense from but connected in its commission with the charge(s)  
3 above, complainant further complains and says:

4  
5 **COUNT 4: LEWD ACTS UPON A CHILD PC.288(A)**

6 On or about November 12, 2016, in the County of San Joaquin,  
7 California, LYLE BURGESS, did commit the crime of LEWD ACT UPON A  
8 CHILD, in violation of Section 288(a) of the Penal Code, a FELONY,  
9 who at the time and place last aforesaid, did willfully,  
10 unlawfully, and lewdly commit a lewd and lascivious act upon and  
11 with the body and certain parts and members thereof of JANE H. DOE  
12 (DOB 10/12/2010) , a child under the age of fourteen years, with  
13 the intent of arousing, appealing to, and gratifying the lust,  
14 passions, and sexual desires of the said defendant(s) and the said  
15 child. It is further alleged that the above offense is a serious  
16 felony within the meaning of Penal Code Section 1192.7(c)(6).

17  
18 NOTICE: Conviction of this offense will require you to register  
19 pursuant to Penal Code Section 290. Willful failure to register is  
20 a crime. NOTE: In Calaveras County - Touched Vagina.  
21

22  
23  
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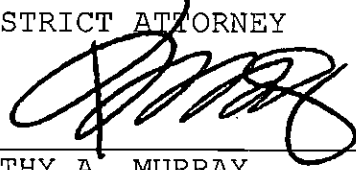
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1 Pursuant to Penal Code 1054.5(b), the People hereby informally  
2 request that the defendant and his/her attorney disclose to the  
3 People all information and materials described in Penal Code  
4 Section 1054.3.

5 Dated: NOVEMBER 3, 2017

6 TORI VERBER SALAZAR  
7 DISTRICT ATTORNEY



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10 KATHY A. MURRAY  
11 DEPUTY DISTRICT ATTORNEY

12 DCR