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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SOLANO

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff

vs.

Case No. FC2318765

FELONY COMPLAINT

DAWN DIANA RAINES-HEWES (8/19/1964)

aka: DAWN D RADOSEVIC
DAWN DIANA RAINESHEWES

Defendant

The undersigned is informed and believes that:

COUNT 1

On or about December 29, 2015, defendant DAWN DIANA RAINES-HEWES did commit a felony namely: MURDER, a violation of Section 187(a) of the Penal Code of the State of California, County of Solano, in that said defendant did unlawfully, and with malice aforethought murder R. K., a human being.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

COUNT 2

On or about December 29, 2015, defendant DAWN DIANA RAINES-HEWES did commit a felony namely: ASSAULT ON A CHILD CAUSING DEATH, a violation of Section 273ab(a) of the Penal Code of the State of California, County of Solano, in that said defendant did unlawfully, having care and custody of R. K., a child under the age of 8 years, assault that child by means of force that to a reasonable person would be likely to produce bodily injury, resulting in the child's death.

1 It is further alleged, pursuant to Penal Code Sections 1170(h)(3), 1170(f) and 1385, that the
2 defendant is not eligible to be sentenced to a term of imprisonment in the county jail on an
3 executed sentence due to a prior or current felony conviction for a serious felony described in
4 subdivision (c) of Penal Code Section 1192.7, or a prior or current conviction for a violent felony
5 described in subdivision (c) of Penal Code Section 667.5, or a prior felony conviction in another
6 jurisdiction for an offense that has all of the elements of a serious felony described in subdivision
7 (c) of Penal Code Section 1192.7, or a violent felony described in subdivision (c) of Penal Code
8 Section 667.5, or because the defendant is required to register as a sex offender pursuant to Penal
9 Code Section 290, or because the defendant is convicted of a crime and as part of the sentence an
10 enhancement pursuant to Penal Code Section 186.11 is imposed.

11 It is further alleged that the defendant DAWN DIANA RAINES-HEWES, did commit acts which
12 aggravate the above crimes pursuant to Rules 4.408 and 4.421 of the California Rules of Court.
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1 **DISCOVERY REQUEST PURSUANT TO PENAL CODE SECTION 1054/1054.7:**

2 Pursuant to Penal Code sections 1054 through 1054.7, the People request that, within fifteen (15)
3 days, the defendant and/or her attorney disclose: (a) The names and addresses of persons, other
4 than the defendant, she intends to call as witnesses at trial, together with any relevant written or
5 recorded statements of experts made in connection with the case, and including the results of
6 physical or mental examinations, scientific tests, experiments, or comparisons which the
7 defendant intends to offer in evidence at the trial. This request is a continuing request, to cover
8 not only all such material currently in existence, but also all material which comes into existence
9 to the conclusion of this case.

10 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND
11 CORRECT AND THAT THIS COMPLAINT CONSISTS OF 2 COUNTS.

12 Executed at Fairfield, California, on December 31, 2015.

13 
14 _____
15 JOHN M. DAUGHERTY
16 DECLARANT AND COMPLAINANT

17 AGENCY: FPD

18 D.A. NO.: F155279

19 Arresting Officer: PARODI, Badge # 1594

20 DEFENDANT	21 CII NO	22 DOB	23 BOOKING NO	24 CUSTODY R'TN DATE
25 DAWN DIANA RAINES- 26 HEWES	A27580 295	8/19/1964	15-19322	