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FEB 03 2023

SHASTA COUNTY SUPERIOR COURT
BY: J. JEFFERS, DEPUTY CLERK

DA File No. 21F06622
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Attorney for Plaintiff

IN THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF SHASTA

THE PEOPLE OF THE STATE OF CALIFORNIA
Plaintiff,

vs.

**PACIFIC GAS AND ELECTRIC COMPANY
(PG&E)**

Defendant(s)

Court No. 21-06622

INFORMATION FELONY

ARRAIGNMENT DATE:
February 15, 2023

CAL FIRE/CDF 20CASHU009978

The District Attorney of Shasta County, accuses
PACIFIC GAS AND ELECTRIC COMPANY (PG&E),
of having committed, in the County of Shasta, State of California, the following crime(s):

COUNT 1

INVOLUNTARY MANSLAUGHTER, in violation of 192(B) of the Penal Code, a Felony

Defendants(s)

PACIFIC GAS AND ELECTRIC COMPANY (PG&E)

On or about 27th day of September, 2020, did unlawfully, and without malice, kill **FEYLA MCLEOD**, a human being, in the commission of an unlawful act, not amounting to a felony; and in the commission of a lawful act which might have produced death, in an unlawful manner, and without due caution and circumspection.

COUNT 2

INVOLUNTARY MANSLAUGHTER, in violation of 192(B) of the Penal Code, a Felony

Defendants(s)

PACIFIC GAS AND ELECTRIC COMPANY (PG&E)

On or about 27th day of September, 2020, did unlawfully, and without malice, kill **ALAINA MICHELLE ROWE**, a human being, in the commission of an unlawful act, not amounting to a felony; and in the commission of a lawful act which might have produced death, in an unlawful manner, and without due caution and circumspection.

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2 COUNT 3

3 **INVOLUNTARY MANSLAUGHTER, in violation of 192(B) of the Penal Code, a Felony**

4 Defendants(s)

5 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E)**

6 On or about 27th day of September, 2020, did unlawfully, and without malice, kill **KARIN KING**,
7 a human being, in the commission of an unlawful act, not amounting to a felony; and in the
8 commission of a lawful act which might have produced death, in an unlawful manner, and without
9 due caution and circumspection.

10 COUNT 4

11 **INVOLUNTARY MANSLAUGHTER, in violation of 192(B) of the Penal Code, a Felony**

12 Defendants(s)

13 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E)**

14 On or about 27th day of September, 2020, did unlawfully, and without malice, kill **KENNETH**
15 **BRUCE VOSSEN**, a human being, in the commission of an unlawful act, not amounting to a
16 felony; and in the commission of a lawful act which might have produced death, in an unlawful
17 manner, and without due caution and circumspection.

18 COUNT 5

19 **RECKLESSLY CAUSING A FIRE WITH GREAT BODILY INJURY, in violation of 452(A)**
20 **of the Penal Code, a Felony**

21 Defendants(s)

22 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E)**

23 On or about 27th day of September, 2020, did unlawfully and recklessly set fire to and burn and
24 cause to be burned a structure, forest land, personal property and did cause great bodily injury to
25 **FEYLA MCLEOD** and **ALAINA MICHELLE ROWE** and **KARIN KING** and **KENNETH**
26 **BRUCE VOSSEN** "NOTICE: The above offense is a serious felony within the meaning of Penal
27 Code section 1192.7(c)."

28 COUNT 6

RECKLESSLY CAUSING FIRE TO INHABITED STRUCTURE, in violation of 452(B) of
the Penal Code, a Felony

Defendants(s)

PACIFIC GAS AND ELECTRIC COMPANY (PG&E)

On or about 27th day of September, 2020, did unlawfully and recklessly set fire to and burn and
cause to be burned an inhabited structure and inhabited property located at ZOGG MINE ROAD
(ZOGG FIRE).

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3 **COUNT 7**

4 **RECKLESSLY CAUSING A FIRE OF A STRUCTURE OR FOREST, in violation of 452(C)**
5 **of the Penal Code, a Felony**

6 Defendants(s)

7 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E)**

8 On or about 27th day of September, 2020, did unlawfully and recklessly set fire to and burn and
9 cause to be burned a structure and forest land located at ZOGG MINE ROAD (ZOGG FIRE).

10 **COUNT 8**

11 **RECKLESSLY CAUSE FIRE TO PROPERTY OF ANOTHER, in violation of Section**
12 **452(D) of the Penal Code, a Misdemeanor.**

13 Defendants(s)

14 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E)**

15 On or about the 27th day of September, 2020, did unlawfully and recklessly set fire to and burn and
16 caused to be burned the property of another, to wit: MULTIPLE DOMESTICATED ANIMALS,
17 located at ZOGG MINE ROAD (ZOGG FIRE).

18 **COUNT 9**

19 **NEGLIGENT FIRE STARTING, in violation of Section 13001 of the Health and Safety Code,**
20 **a Misdemeanor.**

21 Defendants(s)

22 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E)**

23 On or about the 27th day of September, 2020, did willfully and unlawfully, through careless and
24 negligent action, throw and place any lighted cigarette, cigar ashes, other flaming or glowing
25 substance, and any substance and thing which may cause a fire, in any place where it may directly
26 and indirectly start a fire.

27 **COUNT 10**

28 **UNLAWFUL FIRE ON PROPERTY OR ANOTHER, in violation of Section 4421 of the**
Public Resource Code, a Misdemeanor.

Defendants(s)

PACIFIC GAS AND ELECTRIC COMPANY (PG&E)

On or about the 27th day of September, 2020, did willfully and unlawfully set fire or cause to be set
fire any forest, brush, or other flammable material on any land not belonging to the defendant
without the permission of the owner, lessee, or agent of the owner or lessee of the land.

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3 **COUNT 11**

4 **UTILITY FAILURE TO COMPLY WITH REGULATIONS, in violation of Section 2110 of**
5 **the Public Utility Code, a Misdemeanor.**

6 Defendant (s)

7 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E),**
8 On or about the 27th day of September, 2020, as a public utility who violated or failed to comply
9 with any part of any provision of the California Constitution or the Public Utilities Code, to wit,
10 section 451 of the Public Utilities Code, by unlawfully failing to furnish and maintain such
11 adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, as are
12 necessary to promote the safety, health, comfort and convenience of its patrons, employees, and the
13 public.

14 **ENHANCEMENTS**

15 **452.1(a)(1) PC SPECIAL ALLEGATION – RECKLESSLY CAUSING FIRE -**
16 **AGGRAVATING FACTORS**

17 It is further alleged that the defendant(s)

18 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E),**

19 As to Count(s) 5, 6, and 7, it is further alleged, pursuant to Penal Code Section 452.1(a), that the
20 following aggravating factor exists: defendant has previously been convicted of a felony violation
21 of Penal Code section 451 or 452, to wit: a violation of Penal Code Section 452 and was convicted
22 thereof on or about the 16TH DAY OF JUNE, 2020, in the BUTTE County Court, Case #
23 20CF1422. .

24 **452.1(a)(2) PC SPECIAL ALLEGATION – RECKLESSLY CAUSING FIRE -**
25 **AGGRAVATING FACTORS**

26 It is further alleged that the defendant(s)

27 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E),**

28 As to Count 5, it is further alleged, pursuant to Penal Code Section 452.1(a), that the following
aggravating factor exists: a firefighter, peace officer, or other emergency personnel suffered great
bodily injury as a result of the offense.

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3 **452.1(a)(3) PC SPECIAL ALLEGATION – RECKLESSLY CAUSING FIRE -**
4 **AGGRAVATING FACTORS**

5 It is further alleged that the defendant(s)
6 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E),**

7 As to Count 5, it is further alleged, pursuant to Penal Code Section 452.1(a), that the following
8 aggravating factor exists: defendant proximately caused great bodily injury to more than one
9 victim.

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11 **454(A) PC SPECIAL ALLEGATION ARSON DURING STATE OF EMERGENCY**

12 It is further alleged that the defendant(s)
13 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E),**

14 As to Count(s) 5, 6, and 7, it is alleged the defendant, committed the above offense during and
15 within an area of a state of emergency, pursuant to Section 8625 of the Government Code, which
16 was proclaimed by the Governor of the State of California, within the meaning of Penal Code
17 Section 454.

18
19 **452.1(a)(4) PC SPECIAL ALLEGATION – RECKLESSLY CAUSING FIRE -**
20 **AGGRAVATING FACTORS**

21 It is further alleged that the defendant(s)
22 **PACIFIC GAS AND ELECTRIC COMPANY (PG&E),**

23 As to Count 6, it is further alleged, pursuant to Penal Code Section 452.1(a), that the following
24 aggravating factor exists: defendant proximately caused multiple structures to burn.

25
26 Respectfully submitted,

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28 STEPHANIE A. BRIDGETT
DISTRICT ATTORNEY

STEPHANIE A. BRIDGETT
DISTRICT ATTORNEY

Subscribed and sworn on February 3, 2023

Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense
counsel provide discovery to the people as required by Penal Code Section 1054.3.

SB/sr