

1 MORGAN B. GIRE
2 District Attorney
3 State Bar No. 205889
4 Placer County District Attorney's Office
5 10810 Justice Center Drive, Suite 240
Roseville, CA 95678-6231

6
7 Tel: (916) 543-8000
8 Fax: (916) 543-2550
9
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11 Filed - 06/20/2024

12 Electronically filed by Superior Court of California
13 County of Placer on 06/20/2024
14 Jake Chatters, Clerk of the Court
15 By B. Delgado Deputy Clerk

16 **SUPERIOR COURT OF CALIFORNIA**
17
18 **COUNTY OF PLACER**

19 --oo--
20

21 THE PEOPLE OF THE
22 STATE OF CALIFORNIA,
23

24 DA NO. 23-10-013100

25 COURT NO. 62-199424

26 **FELONY COMPLAINT**

27 **FAMILY**
VIOLENCE

28 SCHITARA VICTORIA PAGE,
aka: SCHIRTARA VICTORIA WILLIS
aka: SCHITARA VICTORIA WILLIS
aka: SCHIRTARA VICTORIA PAGE
aka: SCHITARA VICTORIA RICE
aka: SCHITARA PAGE
aka: SCHITARA V. RICE

29 Defendant.
30 _____ /
31

32 **COUNT ONE**

33 On or about October 9, 2023, in the County of Placer, the crime
34 CRUELTY TO CHILD BY ABUSE, NEGLECT OR ENDANGERING HEALTH, in
35 violation of PENAL CODE SECTION 273a(a), a Felony, was committed by
36
37

1 SCHITARA VICTORIA PAGE, a person, who, under circumstances or
2 conditions likely to cause great bodily harm or death, willfully
3 caused or permitted L.S., a child of 22 months, to suffer or
4 inflicted thereon unjustifiable physical pain or mental suffering,
5 or who, having care or custody of said, child, did willfully cause
6 or permit the person or health of said child to be placed in such a
7 situation where his or her person or health was endangered.
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10 **SPEC ALLEG-WILLFUL HARM OR INJURY RESULTING IN DEATH**

11 It is further alleged pursuant to section 12022.95 that the
12 said defendant, SCHITARA VICTORIA PAGE, under circumstances and
13 conditions likely to produce great bodily harm and death, willfully
14 caused and permitted a child, to suffer, and inflicted thereon
15 unjustifiable physical pain and injury that resulted in death, and
16 having the care and custody of a child, under circumstances likely
17 to produce great bodily harm and death, willfully caused and
18 permitted that child to be injured and harmed and that injury and
19 harm resulted in death.
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22 **COUNT TWO**

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24 On or about October 9, 2023, in the County of Placer, the crime
25 CRUELTY TO CHILD BY ABUSE, NEGLECT OR ENDANGERING HEALTH, in
26 violation of PENAL CODE SECTION 273a(a), a Felony, was committed by
27 SCHITARA VICTORIA PAGE, a person, who, under circumstances or

1 conditions likely to cause great bodily harm or death, willfully
2 caused or permitted S.S., a child of 22 months, to suffer or
3 inflicted thereon unjustifiable physical pain or mental suffering,
4 or who, having care or custody of said, child, did willfully cause
5 or permit the person or health of said child to be placed in such a
6 situation where his or her person or health was endangered.
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8

9 **SPEC ALLEG-WILLFUL HARM OR INJURY RESULTING IN DEATH**

10 It is further alleged pursuant to section 12022.95 that the
11 said defendant, SCHITARA VICTORIA PAGE, under circumstances and
12 conditions likely to produce great bodily harm and death, willfully
13 caused and permitted a child, to suffer, and inflicted thereon
14 unjustifiable physical pain and injury that resulted in death, and
15 having the care and custody of a child, under circumstances likely
16 to produce great bodily harm and death, willfully caused and
17 permitted that child to be injured and harmed and that injury and
18 harm resulted in death.
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22 I declare under penalty of perjury that the foregoing is true
23 and correct. Executed on June 19, 2024, at Roseville, Placer
24 County, California.
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26 Dated: June 19, 2024
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Respectfully submitted,
Morgan B. Gire

1 District Attorney
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5 BY: Jamie Smith

6 JAMIE M. SMITH,
7 DEPUTY DISTRICT ATTORNEY

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9 **NOTICE .**

10 PLEASE TAKE NOTICE THAT COUNSEL FOR THE PEOPLE HEREBY MAKE
11
12 AN INFORMAL DEMAND FOR DISCOVERY (PURSUANT TO PENAL CODE
13
14 SECTION 1054.3) WITHIN FIFTEEN DAYS.