

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA,
WILEY W. MANUEL COURTHOUSE

PEOPLE OF THE STATE OF CALIFORNIA

NO. 596086
AMENDED
COMPLAINT

v.

ROBERT JACK GILCHRIST

PFN: AOE407 CEN: 4322466

Defendant(s).

RESTITUTION

The Undersigned, being sworn says, on information and belief, that ROBERT JACK GILCHRIST did, in the County of Alameda, State of California, on or about April 4, 2014, commit a Felony, to wit: VEHICULAR MANSLAUGHTER WITH GROSS NEGLIGENCE, a violation of section 192(c)(1) of the PENAL CODE of California, in that said defendant(s) did unlawfully, and without malice, kill JOE LUFT, a human being, while driving a vehicle with gross negligence and in the commission of unlawful act, not amounting to a felony; and while driving a vehicle in the commission of a lawful act which might have produced death, in an unlawful manner, and with gross negligence.

SECOND COUNT

The Undersigned further deposes and says on Information and belief, that said ROBERT JACK GILCHRIST did, in the County of Alameda, State of California, on or about April 4, 2014, commit a Misdemeanor, to wit: UNLICENSED DRIVER, a violation of section 12500(a) of the VEHICLE CODE of California, in that said defendant(s) did unlawfully drive a motor vehicle upon a highway without holding a valid driver's license issued under the Vehicle Code of the State of California.

FIRST PRIOR CONVICTION AS TO DEFENDANT ROBERT GILCHRIST

The undersigned further alleges that before the commission of the offense specified above, said defendant ROBERT JACK GILCHRIST, on or about July 13, 2004, was convicted in the Superior Court of the State of California, in and for the County of ALAMEDA, of the crime of a Felony, to wit: POSSESSION OF A CONTROLLED SUBSTANCE, a violation of section 11350(a) of the HEALTH AND SAFETY CODE of California, and received a sentence of probation therefor.

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

Complainant therefore prays that a warrant issue and that said defendant(s) be dealt with according to law.

Subscribed and sworn to before me,
Thursday, August 7, 2014

/s/ Berkeley PD-14-19224

PAUL F. HORA
Assistant District Attorney
State Bar #166036 slc
Alameda County, California