## **CONFORMED CO**

MAY - 2 2014

SUPERIOR O	EY E. LEWIS, CLERK OF COURT OF THE STATE O COUNTY OF KINGS	COURT F CALIFORNIA
MA	OCONTT OF KINGS	DEPUTY

GREGORY E. STRICKLAND

District Attorney, County of Kings Matthew K. Carr (SBN 262185), Deputy District Attorney

Kings County Government Center

1400 West Lacey Blvd. Hanford, CA 93230

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Telephone: (559) 582-0326

Attorneys for Plaintiff

THE PÉOPLE OF THE STATE OF CALIFORNIA

SUPERIOR COURT OF CALIFORNIA, COUNTY OF KINGS

THE PEOPLE OF THE STATE OF CALIFORNIA,

Case No.: 14CM0187

FIRST AMENDED CRIMINAL COMPLAINT

Plaintiff.

VS.

JEFFREY ALLEN PRINS,

Defendant.

The undersigned, verifying upon information and belief, complains that in the County of Kings, State of California, the defendant did commit the following crimes:

COUNT 1

On or about January 23, 2013, said defendant JEFFREY A. PRINS did commit a MISDEMEANOR, namely: a violation of section 25190 of the Health and Safety Code of the State of California, in that said defendant did violate a rule, regulation, standard, or requirement issued or adopted pursuant to chapter 6.5 of division 20 of the Health and Safety Code, commonly known as the Hazardous Waste Control Law, relating to handling, disposal, and storage of hazardous and universal

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1	wastes at 866 East Fifth Street and 10716 Eighth Avenue in Hanford, California, 93230, to wit,		
2	improper storage of hazardous waste regarding lining and placing tarps over waste piles.		
3			
4	COUNT 2		
5	On or about January 23, 2013, said defendant JEFFREY A. PRINS did commit a		
6	MISDEMEANOR, namely: a violation of section 25212 of the Health and Safety Code of the State of		
7	California, in that said defendant failed to remove materials requiring special handling (MRSH) from		
8	major appliances in which they were contained prior to the appliances being crushed, baled, shredded,		
9	sawed or sheared apart, disposed of, or otherwise processed in a manner that could result in a release or		
10	could prevent the removal of materials that require special handling at 866 East Fifth Street in Hanford,		
11	California, 93230.		
12			
13			
14	I declare under penalty of perjury that the foregoing is true and correct.		
15	Executed on April 30, 2014, at Hanford, California.		
16			
17	GREGORY E. STRICKLAND KINGS COUNTY DISTRICT ATTORNEY		
18	AL -		
19	Ву:		
20	MATTHEW K. CARR Deputy District Attorney		
21			
22	DISCOVERY REQUEST		
23	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		
24	1054.3.		
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