

1 JAMES P FOX  
DISTRICT ATTORNEY  
2 SAN MATEO COUNTY  
STATE BAR NO. 45169  
3 BY: SHIN MEE CHANG  
DEPUTY DISTRICT ATTORNEY  
4 400 COUNTY CENTER  
REDWOOD CITY, CA 94063  
5  
6 TELEPHONE: (650) 363-4636  
7  
8 ATTORNEYS FOR PLAINTIFF

**FILED**  
**SAN MATEO COUNTY**

JUN 01 2010

Clerk of the Superior Court  
By *[Signature]*  
DEPUTY CLERK

8 IN AND FOR THE SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF SAN MATEO

10 THE PEOPLE OF THE STATE OF CALIFORNIA, )  
11 ) DA CASE: IND 0415259  
PLAINTIFF, ) ( FELONY )  
12 )  
V. ) INDICTMENT  
13 )  
SHANNON STEVEN FOX )  
14 )  
15 )  
16 )  
DEFENDANT (S) )

**SC071093A**

17  
18 THE GRAND JURY OF THE COUNTY OF SAN MATEO, STATE OF  
19 CALIFORNIA, HEREBY ACCUSES SHANNON STEVEN FOX, OF THE CRIMES OF  
20 FELONY, COMMITTED AS FOLLOWS IN SAN MATEO COUNTY:

21  
22 COUNT: 001, ON OR ABOUT 11/12/2009, SHANNON STEVEN FOX DID  
23 UNLAWFULLY KILL A HUMAN BEING, TO WIT: LISA XAVIER, WITHOUT  
24 MALICE BUT WITH GROSS NEGLIGENCE, AS A PROXIMATE RESULT OF THE

1 | COMMISSION BY SAID DEFENDANT OF AN UNLAWFUL ACT, A VIOLATION OF  
2 | VEHICLE CODE SECTION 21453(A), RUNNING A RED LIGHT AND VEHICLE  
3 | CODE SECTION 22349, SPEEDING, WHILE DRIVING A VEHICLE, IN  
4 | VIOLATION OF PENAL CODE SECTION 192(C) (1), A FELONY.

5 | IT IS FURTHER ALLEGED THAT SHANNON STEVEN FOX FLED THE  
6 | SCENE OF THE CRIME, IN VIOLATION OF VEHICLE CODE SECTION  
7 | 20001(C).

8 | IT IS FURTHER ALLEGED AS TO DEFENDANT SHANNON STEVEN FOX  
9 | THAT IN THE COMMISSION OF THE ABOVE OFFENSE THE SAID DEFENDANT  
10 | PERSONALLY INFLICTED GREAT BODILY INJURY UPON SHIJI VARGHESE NOT  
11 | AN ACCOMPLICE TO THE ABOVE OFFENSE, WITHIN THE MEANING OF PENAL  
12 | CODE SECTION 12022.7(A).

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14 | COUNT: 002, ON OR ABOUT 11/12/2009, SHANNON STEVEN FOX DID  
15 | WILLFULLY, UNLAWFULLY, AND KNOWINGLY, BEING A DRIVER OF A  
16 | VEHICLE INVOLVED IN AN ACCIDENT RESULTING IN INJURY TO A PERSON  
17 | OTHER THAN HIMSELF/HERSELF, FAIL, REFUSE, OR NEGLECT TO GIVE TO  
18 | THE INJURED PERSON OR TO A TRAFFIC OR POLICE OFFICER AT THE  
19 | SCENE OF THE ACCIDENT HIS/HER NAME AND ADDRESS, THE REGISTRATION  
20 | NUMBER OF HIS/HER VEHICLE, AND THE NAME OF THE OWNER OF SAID  
21 | VEHICLE; TO EXHIBIT HIS/HER OPERATOR'S LICENSE; TO RENDER  
22 | REASONABLE ASSISTANCE TO THE INJURED PERSON; OR PERFORM THE  
23 | DUTIES SPECIFIED IN CALIFORNIA VEHICLE CODE SECTIONS 20003 AND  
24 | 20004, IN VIOLATION OF CALIFORNIA VEHICLE CODE SECTION 20001(A),

1 | A FELONY.

2 |

3 | COUNT: 003, ON OR ABOUT 11/12/2009, SHANNON STEVEN FOX DID  
4 | WILLFULLY AND UNLAWFULLY ENGAGE IN A MOTOR VEHICLE SPEED CONTEST  
5 | ON A HIGHWAY AND DID PROXIMATELY CAUSE AN INJURY TO LISA XAVIER  
6 | AND SHIJI VARGHESE IN VIOLATION OF VEHICLE CODE SECTION  
7 | 23109.1(A), A FELONY.

8 |

9 | DATED: JUNE 01, 2010

10 |

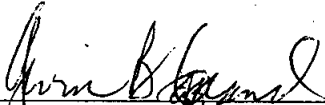
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A T R U E B I L L

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FOREMAN OF GRAND JURY OF THE COUNTY  
OF SAN MATEO, STATE OF CALIFORNIA

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JAMES P FOX, DISTRICT ATTORNEY

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SHIN MEE CHANG  
DEPUTY DISTRICT ATTORNEY

EBA