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**FILED**  
Superior Court of California  
County of Placer

AUG 11 2021

Jake Chatters  
Executive Officer & Clerk  
By: S. Vidal, Deputy

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SUPERIOR COURT OF CALIFORNIA  
COUNTY OF PLACER

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THE PEOPLE OF THE  
STATE OF CALIFORNIA,

Plaintiff,

-vs-

CARL SEAN SMITH  
aka: CARL SEANJR SMITH  
aka: SEAN SMITH

Defendant.

DA NO. 32-171525

COURT NO. 62-171525

AMENDED FELONY  
COMPLAINT

**SXU**

COUNT ONE

On or about and between February 7, 2020 and February 8, 2020,  
in the County of Placer, the crime of PIMPING - MINOR UNDER 16  
YEARS, in violation of PENAL CODE SECTION 266h(b)(2), a Felony, was  
committed by CARL SEAN SMITH, JR., who did unlawfully, and knowing

1 M.G. (DOB: 6/23/05) to be a prostitute, who was a minor under 16  
2 years of age, receive money and proceeds earned from said person's  
3 prostitution activity that supported the defendant, in whole and in  
4 part; and money loaned and advanced to and charged against said  
5 prostitute by a person who kept and managed said prostitute at the  
6 house and other place where the prostitution occurred, supported the  
7 defendant in whole and in part; and the defendant asked for payment  
8 and received payment for soliciting customers for said person.  
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11 It is further alleged that probation shall not be granted to,  
12 nor shall the execution or imposition of sentence suspended pursuant  
13 to Penal Code Section 1203.065(a).  
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15  
16 COUNT TWO

17 On or about and between February 7, 2020 and February 8, 2020,  
18 in the County of Placer, the crime of PROCURING A CHILD TO ENGAGE IN  
19 A LEWD ACT, in violation of PENAL CODE SECTION 266J, a Felony, was  
20 committed by CARL SEAN SMITH, JR., who did willfully, unlawfully,  
21 and intentionally give, transport, provide, make available, and  
22 offer to so do M.G. (DOB: 6/23/05), a child under the age of 16  
23 years, to another person for the purpose of a lewd and lascivious  
24 act as defined in Penal Code Section 288.  
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1 It is further alleged that probation shall not be granted to,  
2 nor shall the execution or imposition of sentence be suspended  
3 pursuant to Penal Code Section 1203.65(a).  
4

5 **COUNT THREE**  
6

7 On or about and between February 7, 2020 and February 8, 2020,  
8 in the County of Placer, the crime of HUMAN TRAFFICKING A MINOR, in  
9 violation of Penal Code section 236.1(c)(1), a Felony, was committed  
10 by CARL SEAN SMITH, JR., who did unlawfully cause, induce,  
11 persuade, and attempt to cause, induce, and persuade, M.G. (DOB:  
12 6/23/05), who is a minor, to engage in a commercial sex act with the  
13 intent to effect or maintain a violation of Penal Code section 266,  
14 266h, 266i, 266j, 267, 311.11, 311.2, 311.3, 311.4, 311.5, 311.6, or  
15 518.  
16

17  
18 "NOTICE: Conviction of this offense will require you to  
19 register pursuant to Penal Code Section 290. Willful failure to  
20 register is a crime."  
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22  
23 "NOTICE: Pursuant to the provisions of PC Section 293.5 the use  
24 of the pseudonym "Jane or John Doe", if it appears in the complaint  
25 or information, is for purposes of protecting the privacy of the  
26 alleged victim."  
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1  
2 I declare under penalty of perjury that the foregoing is true  
3 and correct. Executed on August 11, 2021, at Roseville, Placer  
4 County, California.  
5

6 Dated: August 11, 2021

7 Respectfully submitted,

8 Morgan B. Gire  
9 District Attorney

10  
11 BY: G. Nargie  
12 GINA N. NARGIE,  
13 DEPUTY DISTRICT ATTORNEY

14 **NOTICE.**

15 **PLEASE TAKE NOTICE THAT COUNSEL FOR THE PEOPLE HEREBY MAKE**  
16 **AN INFORMAL DEMAND FOR DISCOVERY (PURSUANT TO PENAL CODE**  
17 **SECTION 1054.3) WITHIN FIFTEEN DAYS.**  
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