

STATE OF SOUTH DAKOTA
:SS
COUNTY OF CODINGTON

STATE OF SOUTH DAKOTA,
Plaintiff

IN CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
05-0956

COMPLAINT

vs.

1. Animal Facility Trespass
(SDCL 40-38-2 (1,2,3,4,5, and 6), 40-38-3, & 22-6-1(8))
2. Burglary, 3rd Degree
(SDCL 22-32-8 & 22-6-1(6))
3. Intentional Damage to Property - 1st Degree (Over \$500.00)
(SDCL 22-34-1 & 22-6-1(6))

PETER DANIEL YOUNG
Date of Birth: June 26, 1977
Defendant.

The undersigned being first duly sworn upon oath charges:

COUNT I

That on or about October 16, 1997, in the County of Codington, State of South Dakota, Peter Daniel Young, did commit the public offense of ANIMAL ENTERPRISE TRESPASS (SDCL 40-38-2(1, 2, 3, 4, 5, and 6), 40-38-3, & 22-6-1(8)) in that he did without consent of the owners intentionally damaged an animal or property in or on the animal facility or obstruct any enterprise conducted at the animal facility; or did acquire or otherwise exercise control over an animal facility or an animal or other property from an animal facility with the intent to deprive the owner or to obstruct the enterprise conducted at the facility; or did enter an animal facility, not then open to the public, with intent to commit any act prohibited; or did enter an animal facility remain concealed with intent to commit any act prohibited; or did enter an animal facility and commit or attempt to commit any act prohibited; or did intentionally turn out or release any animal in or on an animal facility; to-wit, Turbak Mink Ranch, rural Codington County, South Dakota in an amount of damage exceeding Five Hundred Dollars (\$500.00).

COUNT II

That on or about October 16, 1997, in the County of Codington, State of South Dakota, Peter Daniel Young, did commit the public offense of BURGLARY - THIRD DEGREE (SDCL 22-32-8 & 22-6-1(6)) in that said individual did enter or remain in an unoccupied structure with intent to commit a crime therein; to-wit: Turbak Mink Ranch, rural Codington County South Dakota, to commit intentional damage to property and release of the animals housed therein;

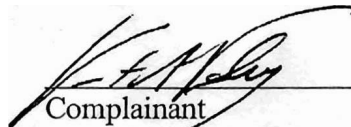
COUNT III

That on or about October 16, 1997, in the County of Codington, State of South Dakota, Peter Daniel Young, did commit the public offense of INTENTIONAL DAMAGE TO PROPERTY - FIRST DEGREE (SDCL 22-34-1 & 22-6-1(6)) in that said individual did intentionally cause damage in an amount of more than \$500.00, to property owned by another, without the owner's consent: to-wit: an animal housing facility owned by Eric M. Turbak and Kathleen A. Turbak, dba: Turbak Mink Ranch, Kranzburg, South Dakota;

contrary to the statute in such case made and provided against the peace and dignity of the State of South Dakota.

Based upon the Officer's report.

Dated this date, December 21, 2005


Complainant
Office of State's Attorney

Subscribed and sworn to before me this date, December 21, 2005.

(SEAL)

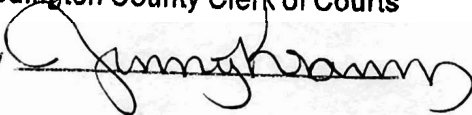
MY COMMISSION EXPIRES: 04/12/08


Notary Public - South Dakota

STATE OF SOUTH DAKOTA
Third Judicial Circuit Court
I hereby certify that the foregoing instrument is a true and correct copy of the original as the same appears on file in my office on this date:

SEP 29 2006

Connie Hartley
Codington County Clerk of Courts

By 

FILED
DEC 22 2005
SOUTH DAKOTA UNIFIED JUDICIAL SYSTEM
3RD CIRCUIT CLERK OF COURT
By _____