

1
2 ANNE MARIE SCHUBERT
3 DISTRICT ATTORNEY
4 901 G STREET
5 SACRAMENTO, CA 95814
6 (916) 874-6218

SSD-80-31213
R. NORGAARD, DDA
TEAM: MC
XRef: 745527

7
8
9 **SUPERIOR COURT OF CALIFORNIA**
10 **COUNTY OF SACRAMENTO**

11
12 THE PEOPLE OF THE STATE OF CALIFORNIA,

FELONY COMPLAINT

13
14
15 vs.

16
17 PHILLIP LEE WILSON ,

18 Defendant.

19
20 The People of the State of California upon oath of the undersigned, upon information and belief
21 complain against the defendant above named for the crime(s) as follows:

22
23 **COUNT ONE**

24 On or about April 24, 1980, at and in the County of Sacramento, State of California, the
25 defendant, PHILLIP LEE WILSON, did commit a felony, namely: a violation of Section 187(a)
26 of the Penal Code of the State of California, in that said defendant did unlawfully, and with
27 malice aforethought murder ROBIN GISELA BROOKS, a human being.
28

29
30 "NOTICE: The above offense is a serious and violent felony within the meaning of Penal Code
31 Sections 1192.7(c)(1) and 667.5(c)(1)."

32
33 **SPECIAL CIRCUMSTANCE**

34 **1.**

35 It is further alleged that the murder of the ROBIN GISELA BROOKS was committed by the
36 defendant, PHILLIP LEE WILSON, while the said defendant was engaged in the commission the
37 crime of Rape, within the meaning of Penal Code Section 190.2(a)(17).
38
39
40
41



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41

That attached hereto and by this reference incorporated herein is a declaration setting forth facts in support of probable cause for the issuance of a warrant of arrest herein.

I declare upon information and belief and under penalty of perjury that the foregoing is true and correct.

Executed at Sacramento County, California, the 22nd day of April, 2020.



ROD NORGAARD
SACRAMENTO COUNTY DISTRICT ATTORNEY
(916) 874-6218
Telephone Number

NS

HOLDING ORDER

_____ It appearing to me that the offense(s) in the within complaint has/have been committed, and that there is sufficient cause to believe that the defendant, PHILLIP LEE WILSON, is guilty thereof,

_____ The defendant, PHILLIP LEE WILSON, having waived preliminary hearing to the offense(s) set forth in this complaint,

Exceptions/Additions/Conditions: _____

I order that the defendant be held to answer to same. In my capacity as Judge of the Superior Court, I deem the within complaint to be an Information and order it filed in the Superior Court.

Date: _____ Dept: _____

Judge of the Superior Court Sitting as Magistrate



1
2
3
4 **DECLARATION IN SUPPORT OF ARREST WARRANT**

5 (Made under 2015.5 CCP)
6

7 The undersigned hereby declares:

8 That your declarant is currently employed as a Deputy District Attorney for the County of
9 Sacramento, State of California.

10 That pursuant to said employment, your declarant has been assigned to investigate
11 allegations that the defendant, PHILLIP LEE WILSON, did commit the crime(s) as set forth in
12 the attached complaint.

13 That pursuant to said assignment, your declarant has contacted person(s) having
14 knowledge of said offense(s) and who has/have prepared written reports and/or statements,
15 and/or has received and read written reports and/or statements prepared by others known by your
16 declarant to be law enforcement officers, all of which reports and/or statements are included in a
17 report consisting of 28 page(s), which is attached hereto as Exhibit I and incorporated by
18 references as though fully set forth.
19

20 That each of these documents is presently an official record of a law enforcement agency.

21 WHEREFORE, your declarant prays that a warrant issue for the arrest of the
22 hereinabove-named defendant and that said defendant be dealt with according to law.

23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on the 22nd day of April, 2020, Sacramento, California.
25
26
27

28 

30
31 _____
32 ROD NORGAARD

33 Declarant

34 901 G Street,

35 Sacramento, California 95814

36 Sacramento County District Attorney
37
38
39
40
41

