

FILED

AUG 26 2014

STATE OF SOUTH DAKOTA

IN CIRCUIT COURT

COUNTY OF UNION

SS. *Jessica Larsen*
UNION COUNTY CLERK OF COURTS

FIRST JUDICIAL CIRCUIT

STATE OF SOUTH DAKOTA,
PLAINTIFF,
VS.
AUDREY HURLEY
DOB: 01/20/69,
DEFENDANT.

CR. NO. 14-064

SUPERSEDING COMPLAINT

The undersigned being duly sworn upon oath charges:

COUNT I

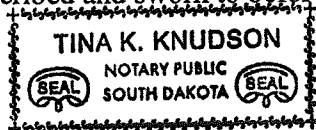
That on or about December 7, 2012 through July 1, 2013, in the County of Union, State of South Dakota, Audrey Hurley did commit the public offense of CONTRIBUTORY ABUSE OF A CHILD contrary to SDCL § 26-9-1 in that Audrey Hurley did, by any act, cause, encourage, or contribute to the abuse of a child, consistent with SDCL § 26-8A-2(3) and / or (8) to wit: Within the time frame stated above, Audrey Hurley did (3) on at least four occasion provide an environment that was injurious to the M.B. welfare, and or (8) did subject M.B. to sexual abuse, sexual molestation, or sexual exploitation as person responsible for the child's care, and in such acts has caused or merely encouraged contributory abuse, to wit: Audrey Hurley did on at least one occasion commit the act of fellatio, and on at least three occasions commit the acts which included intercourse with M.B. a minor child under the age of 18 pursuant to (SDCL § 26-7A-1(6)&(21) and Chapters 26-8A, 26-8B, and 26-8C) within the times stated above and for that reason is guilty of a Class 1 misdemeanor, contrary to statute in such case made and provided against the peace and dignity of the State of South Dakota.

Dated this 26th day of August, 2014, at Elk Point, South Dakota.

Jerry A. Miller

JERRY A. MILLER
UNION COUNTY STATE'S ATTORNEY
209 EAST MAIN STREET ~ SUITE #140
ELK POINT, SD 57025

Subscribed and sworn to before me this 26th day of August, 2014.



(SEAL)

Tina K. Knudson

Tina K. Knudson
Notary Public*South Dakota
My Commission Expires: 3/21/2019