

STATE OF INDIANA)
) SS:
ST. JOSEPH COUNTY)

IN THE ST. JOSEPH SUPERIOR COURT

CAUSE NO. 71D08-1307-FA-000179

STATE OF INDIANA)
)
VS.)
)
PURVI PATEL)

SECOND **AMENDED** INFORMATION
IN TWO COUNTS
COUNT I: NEGLECT OF A DEPENDANT,
CLASS A FELONY
COUNT II: FETICIDE, CLASS B FELONY

FILED

DEC 08 2014

St. Joseph Superior Court Clerk

COUNT I

MARK J. ROULE, upon information and belief, and having affirmed under the penalty of perjury, says that:

On or about the 13th day of July, 2013, in St. Joseph County, State of Indiana PURVI PATEL, who is more than eighteen (18) years old, and having the care of a dependent, did knowingly place that dependent in a situation that endangered the dependent's life or health by failing to provide any medical care for that dependent immediately after the dependent's birth, resulting in the death of that dependent, who was less than fourteen (14) years old.

All of which is contrary to the form of the statute in such cases made and provided, to wit: I.C. 35-46-1-4(b)(3), and against the peace and dignity of the State of Indiana.

COUNT II

MARK J. ROULE, upon information and belief, and having affirmed under the penalty of perjury, says that:

Between the 9th day of July, 2013, and July 13, 2013, in St. Joseph County, State of Indiana PURVI PATEL, did knowingly terminate a human pregnancy, **to wit: her own pregnancy, by ingesting medication**, with the intention other than to produce a live birth or to remove a dead fetus, and the conduct of PURVI PATEL was not an abortion performed in compliance with I.C. 16-34.

Misoprostol

mifepristone

DEFENSE ATTORNEY'S COPY

STATE OF INDIANA)
ST. JOSEPH COUNTY) SS:
STATE OF INDIANA)
VS.)
PURVI PATEL)

IN THE ST. JOSEPH SUPERIOR COURT

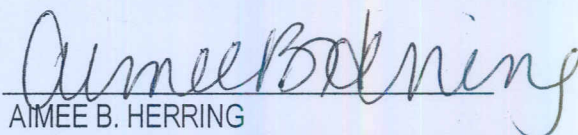
CAUSE NO. 71D08-1307-FA-00017

FILED -
DEC 08 2014

St. Joseph Superior Court Clerk

MINUTE ENTRY

State files *Response to Defendant's Motion to Exclude Expert Testimony.*


AIMEE B. HERRING
DEPUTY PROSECUTING ATTORNEY

Approved:

JUDGE, ST. JOSEPH SUPERIOR COURT

STATE OF INDIANA)
) SS:
ST. JOSEPH COUNTY)

IN THE ST. JOSEPH SUPERIOR COURT
CAUSE NO. 71D08-1307-FA-00017

STATE OF INDIANA)
)
VS.)
)
PURVI PATEL)

FILED
DEC 08 2014
St. Joseph Superior Court Clerk

MOTION TO AMEND THE CHARGING INFORMATION
(COUNT II)

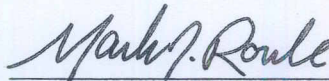
Comes now the State of Indiana, by Chief Deputy Prosecuting Attorney Mark J. Roule,
and files this Motion to Motion to Amend the Information filed in this matter, stating as follows:

1. The State's Motion to Amend the Information is authorized under 35-34-1-5 at any time before the commencement of trial if the amendment does not prejudice the substantial rights of the Defendant.
2. The State asserts that the Motion to Amend does not prejudice the substantial rights of the Defendant for the following reasons:
 - a. The amendment to the information is made specifically in response to Defendant's claims that Count II of the Information fails to state the offense with sufficient specificity (as alleged in paragraph 4.a. of the Defendant's Motion to Dismiss, filed November 7th, 2014).
 - b. The State does not concede that the Defendant's arguments in her motion are correct. However, the State has no disincentive to amend the charges to correct the alleged claims of defect presented by Defense.
 - c. This amendment does not present a significant change in the factual allegations or legal theory asserted by the State. The amendment to the

language of the charge itself contains information that was originally presented in the charging instrument, via the Supplemental Affidavit in Support of Probable Cause.

- d. The proposed amendment adds the language "*to wit: her own pregnancy, by ingesting medication*" adding no substantive changes to the charge as presently filed.

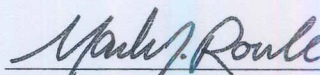
WHEREFORE, the State of Indiana respectfully requests that the Court accept the filing of the Second **Amended Information**, and for any other relief as is just and proper.



MARK J. ROULE
CHIEF DEPUTY PROSECUTING ATTORNEY

CERTIFICATE OF SERVICE

I swear that a copy of the foregoing document, along with the Second Amended Information referenced herein, was served upon Defendant by Counsel Jeffrey Sanford, by placing same in the United States Mail, addressed to Jeffrey Sanford, 212 S. Taylor St., South Bend, IN 46601, with proper postage affixed, on the 8th day of December, 2014..



Mark J. Roule