

FILED

AUG 13 2009

@ 10:41 am

**IN THE CIRCUIT COURT OF THE STATE OF OREGON FOR WASHINGTON COUNTY**

STATE OF OREGON,

Plaintiff,

vs.

SARAH ROSE DILLARD-LUBIN,

Defendant.

No. C091730CR

**INDICTMENT - Secret**

The above named defendant is accused by the Grand Jury of Washington County by this indictment of the crimes of

- Count 1: ASSAULT IN THE FIRST DEGREE (FSG=10; A Felony; ORS 163.185) FPC#: 81141786
- Count 2: ASSAULT IN THE FIRST DEGREE (FSG=10; A Felony; ORS 163.185(b))
- Count 3: ASSAULT IN THE SECOND DEGREE (FSG=9; B Felony; ORS 163.175)
- Count 4: ASSAULT IN THE THIRD DEGREE (FSG=6; C Felony; ORS 163.165)
- Count 5: ASSAULT IN THE THIRD DEGREE (FSG=6; C Felony; ORS 163.165)
- Count 6: APPLICATION OF CONTROLLED SUBSTANCE TO THE BODY OF ANOTHER PERSON (FSG=8; B Felony; ORS 475.910(1b))
- Count 7: CRIMINAL MISTREATMENT IN THE FIRST DEGREE (FSG=7; C Felony; ORS 163.205)

committed as follows:

**COUNT 1**

The defendant on or about June 4, 2009, in Washington County, Oregon, did unlawfully and intentionally cause serious physical injury to Elise Park by means of a dangerous weapon, to-wit: morphine.

The State further alleges that the above-named victim did not substantially contribute to the commission of the above-described offense by precipitating the attack..

**COUNT 2**

The defendant, on or about June 4, 2009, in Washington County, Oregon, did unlawfully and knowingly cause serious physical injury to Elise Park, a child under six years of age.

The state further alleges that the above-named victim did not substantially contribute to the commission of the above-described offense by precipitating the attack.

**COUNT 3**

The defendant on or about June 4, 2009, in Washington County, Oregon, did unlawfully and intentionally cause serious physical injury to Elise Park by means of a dangerous weapon, to-wit: morphine.

**COUNT 4**

The defendant, on or about June 4, 2009, in Washington County, Oregon, did unlawfully and intentionally cause serious physical injury to Elise Park by means of a dangerous weapon, to wit: morphine

**COUNT 5**

The defendant, being at least 18 years of age, on or about June 4, 2009, in Washington County, Oregon, did unlawfully and knowingly cause physical injury to Elise Park a child 10 years of age or younger.

**COUNT 6**

The defendant, on or about June 4, 2009, in Washington County, Oregon, did unlawfully and intentionally apply Morphine, a Schedule II controlled substance to the body of Elise Park, a child under 18 years of age, by means of ingestion.

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COUNT 7

The defendant, on or about June 4, 2009, in Washington County, Oregon, having assumed the permanent or temporary care, custody or responsibility for the supervision of Elise Park, a dependent child, did unlawfully and knowingly cause physical injury or injury to the said child.

contrary to the statutes and against the peace and dignity of the State of Oregon.

It is hereby affirmatively declared for the record, upon appearance of the defendant for arraignment, and before the Court asks how the defendant pleads to the charges, that the State intends that any misdemeanor offenses charged herein each proceed as a misdemeanor.

Dated: 8/12/09

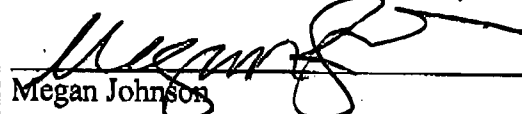
Witnesses subpoenaed, examined and appeared in person unless otherwise indicated before the Grand Jury for the State of Oregon:

- Wallace Lai
- John Shipley
- Dan Leonhardt
- Records custodian - St. Vincent's Hospital - by report
- Connie V. Miller - by report
- Patty Todd - by report

A TRUE BILL

  
Foreperson of the Grand Jury

BOB HERMANN, District Attorney

  
Megan Johnson  
Deputy District Attorney  
Oregon State Bar # 012819

DA # 09-7043  
HBS 09-509577  
DOB 05/06/1984

- Security Amount - \$ 250,000
- Recognizance/Conditional Release