

A M E N D E D C O M P L A I N T
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,

Bkg no.
Plaintiff,

vs.

KELLY LYNCH 01/27/1957 F

P273.6(a)

P273.6(a), P653m(b), P653m(b), P653m(b),
P653m(b), P653m(b), P653m(b), P653m(b),
P653m(b), P653m(b), P653m(b), P653m(b),
P653m(b), P653m(a), P653m(a), P166(c) (1)

Defendant(s).

MISDEMEANOR COMPLAINT

CCMS Case No.: 6CJ03685
Court Case No.:

FILED
SHERRI R. CARTER
Executive Officer/Clerk

By _____
Deputy Clerk

Issued by
MICHAEL N. FEUER
City Attorney

By _____
RALSTON HENRY
Deputy City Attorney

FILED
Superior Court of California
County of Los Angeles
JUN 26 2017
(CH)

Comes now the undersigned and states that he is informed and believes, and upon such information and belief declares: That on or about 07/27/2016 - 07/29/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (a) of Section 273.6 of the California Penal Code was committed by the above-named defendant(s) (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did willfully, unlawfully, intentionally and knowingly violate a protective order, as defined in Section 6218 of the Family Code, and an order issued pursuant to Sections 527.6, 527.8. and 527.85 of the Code of Civil Procedure, and an order issued pursuant to Section 15657.03 of the Welfare and Institutions Code, in Case Number BQ033717 issued on 05/25/2011.

TCIS 273.6(a)/21

FILED
Superior Court of California
County of Los Angeles
JUN 26 2017
Sherri R. Carter, Executive Officer/Clerk
By _____, Deputy
Elisa Muñoz-Tenorio

COUNT II

For a further, separate and second cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 08/24/2016 - 08/26/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (a) of Section 273.6 of the California Penal Code was committed by the above-named defendant(s) (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did willfully, unlawfully, intentionally and knowingly violate a protective order, as defined in Section 6218 of the Family Code, and an order issued pursuant to Sections 527.6, 527.8. and 527.85 of the Code of Civil Procedure, and an order issued pursuant to Section 15657.03 of the Welfare and Institutions Code, in Case Number BQ033717 issued on 05/25/2011.

TCIS 273.6(a)/21

COUNT III

For a further, separate and third cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 12/05/2015 - 01/04/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit, MICHELLE RICE, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT IV

For a further, separate and fourth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 01/06/2016 - 02/28/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit, MICHELLE RICE, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT V

For a further, separate and fifth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 03/01/2016 - 04/30/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit, MICHELLE RICE, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT VI

For a further, separate and sixth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/01/2016 - 06/30/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit, MICHELLE RICE, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT VII

For a further, separate and seventh cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 07/01/2016 - 08/31/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit,, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT VIII

For a further, separate and eighth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 09/01/2016 - 11/30/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit, MICHELLE RICE, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT IX

For a further, separate and ninth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 12/05/2015 - 01/04/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit, ROBERT KORY, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT X

For a further, separate and tenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 01/06/2016 - 02/28/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit, ROBERT KORY, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT XI

For a further, separate and eleventh cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 03/01/2016 - 04/30/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit, ROBERT KORY, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT XII

For a further, separate and twelfth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/01/2016 - 06/30/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit, ROBERT KORY, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT XIII

For a further, separate and thirteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 07/01/2016 - 08/31/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit, ROBERT KORY, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT XIV

For a further, separate and fourteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 09/01/2016 - 11/30/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with intent to annoy and harass, make repeated telephone calls and make repeated contact by means of an electronic communication device, and make a combination of calls and contact, to another person, to wit, ROBERT KORY, whether or not conversation ensued from making the telephone call and contact by means of an electronic communication device.

TCIS 653m(b)/21

COUNT XV

For a further, separate and fifteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 01/05/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (a) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with the intent to annoy, telephone and make contact by means of an electronic communication device and address to and about another, to wit, MICHELLE RICE, obscene language, and address to said person a threat to inflict injury to the person and property of the person addressed and to a member of his or her family.

TCIS 653m(a)/21

COUNT XVI

For a further, separate and sixteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 01/05/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (a) of Section 653m of the California Penal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully and unlawfully, with the intent to annoy, telephone and make contact by means of an electronic communication device and address to and about another, to wit, ROBERT KORY, obscene language, and address to said person a threat to inflict injury to the person and property of the person addressed and to a member of his or her family.

TCIS 653m(a)/21

COUNT XVII

For a further, separate and seventeenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 02/27/2017 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (c)(1) of Section 166 of the California Penal Code was committed by the above-named defendant(s) (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did willfully, unlawfully, and knowingly violate a protective order and stay away court order issued pursuant to Section 136.2 of the California Penal Code, in a pending criminal proceeding involving domestic violence, as defined in Section 13700 of the Penal Code, and elder and dependent adult abuse, as defined in Section 368 of the Penal Code, and that was an order was described in paragraph (3), to wit, Case Number 6CJ03685, order issued on 01/13/2017.

TCIS 166(c)(1)/21

All of which is contrary to the law and against the peace and dignity of the People of the State of California. Declarant and complainant therefore prays that a warrant may be issued for the arrest of said defendant(s) and that he may be dealt with according to law.

Attached hereto and incorporated by reference as though fully set forth are written statements and reports, consisting of pages, which constitute the basis upon which I make the within allegations.

A declaration in Support of the Issuance of Such Warrant is Submitted.

Executed at Los Angeles, California, on 06/09/2017.

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

Declarant and Complainant

INFORMAL DISCOVERY NOTICE

TO THE ABOVE-NAMED DEFENDANT(S) AND/OR ATTORNEY(S) FOR DEFENDANT(S):

Plaintiff, the People of the State of California, hereby requests discovery/disclosure from the defendant(s) and his or her attorney(s) in this case pursuant to Penal Code Sections 1054.3 and 1054.5.

YOU ARE HEREBY NOTIFIED that if complete disclosure is not made within 15 days of this request, plaintiff will seek -- on or before the next court date, or as soon as practicable thereafter -- a court order enforcing the provisions of Penal Code Section 1054.3, subdivision (a). This is an ongoing request for any of the listed items which become known to the defendant(s) and his or her attorney(s) after the date of compliance.

The written statements and reports attached hereto constitute discoverable materials designated in Penal Code Section 1054.1. Any additional material discoverable pursuant to Penal Code Section 1054.1 that becomes known to plaintiff will be provided to the defense.

If, prior to or during trial, as a result of this request plaintiff obtains additional evidence or material subject to disclosure under a previous defense request or court order pursuant to Penal Code Section 1054.1, plaintiff will disclose the existence of that evidence or material within a reasonable time.

DISCOVERY MATERIALS SHOULD BE DELIVERED TO A DEPUTY CITY ATTORNEY IN MASTER CALENDAR COURT ON THE FIRST TRIAL DATE.

NOTICE TO DEFENDANT(S) AND/OR ATTORNEY(S) FOR DEFENDANT(S):
YOU ARE HEREBY NOTIFIED that if complete disclosure is not made within 15 days of this request, plaintiff will seek -- on or before the next court date, or as soon as practicable thereafter -- a court order enforcing the provisions of Penal Code Section 1054.3, subdivision (a). This is an ongoing request for any of the listed items which become known to the defendant(s) and his or her attorney(s) after the date of compliance.

