

1 DA Case ID No. 21-434

FILED

2 C. DAVID EYSTER (SBN #113115) ns
3 District Attorney
4 Mendocino County
5 Courthouse, Room G-10
6 Post Office Box 1000
7 Ukiah, CA 95482
8 (707) 463-4211

FEB 22 2020

CLERK OF MENDOCINO COUNTY
SUPERIOR COURT OF CALIFORNIA

Attorneys for Plaintiffs

9 SUPERIOR COURT OF CALIFORNIA
10 COUNTY OF MENDOCINO

11 THE PEOPLE OF THE STATE OF
12 CALIFORNIA

Plaintiffs,

13 v.

14 KEVIN PATRICK MURRAY,

15 Defendant.

21CRO0061

COMPLAINT-CRIMINAL
FELONY

[Bail schedule: \$175,000]

17 THE UNDERSIGNED, ON INFORMATION AND BELIEF, COMPLAINS AND SAYS,
18 THAT WITHIN THE COUNTY OF MENDOCINO, STATE OF CALIFORNIA

19 COUNT ONE

20 Said defendant KEVIN PATRICK MURRAY did on or between 1st day of June 2014
21 and the 31st day of July 2014, commit the crime of FORCIBLE RAPE, a FELONY violation of
22 Section 261(a)(2) of the California Penal Code, in that said defendant did willfully and
23 unlawfully accomplish an act of sexual intercourse with a person, to wit, Jane Doe, not his
24 spouse, against said person's will, by means of force, violence, duress, menace, and/or fear
25 of immediate and unlawful bodily injury on said person and/or another.
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1 It is further alleged that the above offense is both a violent and serious felony, within the
2 meaning of Penal Code sections 667.5(c)(3) and 1192.7(c)(3), respectively.

3 NOTICE: Conviction of this offense will require the court to order you to submit to a
4 blood test for evidence of antibodies to the probable causative agent of Acquired Immune
5 Deficiency Syndrome (AIDS), pursuant to Penal Code section 1202.1.

6
7 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code
8 Section 290. Willful failure to register is a crime.

9 **SPECIAL ALLEGATION**

10 It is further alleged that during the commission of the above offense, the defendant was
11 armed with a firearm, said arming not being an element of the above offense, within the
12 meaning of Penal Code Section 12022(a)(1).

13
14 **COUNT TWO**

15 Said defendant **KEVIN PATRICK MURRAY** did on or about the 10th day of April 2014,
16 commit the crime of FORCIBLE ORAL COPULATION, a FELONY violation of section
17 288a(c)(2)(A), the predecessor statute to section 287(c)(2), of the California Penal Code, in
18 that said defendant did unlawfully participate in an act of oral copulation with Jane Doe, and
19 did accomplish said act against said victim's will by force, violence, duress, menace, and/or
20 fear of immediate and unlawful bodily injury to said victim and/or to another.

21
22 NOTICE: Conviction of this offense will require the court to order you to submit to a
23 blood test for evidence of antibodies to the probable causative agent of Acquired Immune
24 Deficiency Syndrome (AIDS), pursuant to Penal Code section 1202.1.

25
26 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code
27 Section 290. Willful failure to register is a crime.

1 NOTICE: The above offense is a serious felony, within the meaning of Penal Code
2 Section 1192.7(c)(5), and a violent felony, within the meaning of Penal Code Section
3 667.5(c)(5).

4 The offenses charged in the **TWO COUNTS** of this complaint were of the same class
5 of crime or connected together in their commission.

6 Complainant therefore prays that said defendant be dealt with according to law.

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

8 Executed on February 22, 2021 in Ukiah, California.

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10 
11 _____
12 C. DAVID EYSTER
13 District Attorney

14 Pursuant to Penal Code Section 1054.3, the prosecuting attorney hereby requests that
15 the defendant and his attorney disclose the following:

16 “(a) The names and addresses of persons, other than the defendant, he or she intends
17 to call as witnesses at the trial, together with any relevant written or recorded statements of
18 those persons, or reports of the statements of those persons, including any reports of
19 statements of experts made in connection with the case, and including the results of physical
20 or mental examinations, scientific tests, experiments, or comparisons which the defendant
21 intends to offer in evidence at the trial.”

22 “(b) Any real evidence which the defendant intends to offer in evidence at the trial.”
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