

1 DA Case ID No. 21-711
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

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Superior Court of California
County of Mendocino

By: *S. Moore*
S. Moore
Deputy Clerk

Attorneys for Plaintiff

8 **SUPERIOR COURT OF CALIFORNIA**
9 **COUNTY OF MENDOCINO**

10 THE PEOPLE OF THE STATE OF
11 CALIFORNIA

12 Plaintiff,

13 v.

14 KEVIN PATRICK MURRAY,
15 TIMOTHY ALAN DUGGER,

16 Defendants.

**AMENDED
COMPLAINT-CRIMINAL
FELONY**

17
18 **THE UNDERSIGNED, ON INFORMATION AND BELIEF, COMPLAINS AND**
19 **SAYS THAT WITHIN THE CALIFORNIA COUNTIES OF MENDOCINO AND LAKE,**
20 **WITHIN THE TERRITORIAL AND JURISDICTIONAL MEANING OF PENAL CODE**
21 **SECTION 781:**

22 **COUNT ONE**

23
24 Said defendant **KEVIN PATRICK MURRAY** did on or about the 25th day of February
25 2021, commit the crime of PREPARING FALSE DOCUMENTARY EVIDENCE, a FELONY
26 violation of Section 134 of the California Penal Code, in that said defendant knowingly
27 prepared a false paper, record, or other matter or thing, with intent to produce it, or allow it to
28

1 be produced for any fraudulent or deceitful purpose, as genuine or true, upon any trial,
2 proceeding, or inquiry whatever, authorized by law.

3 **COUNT TWO**

4 Said defendants **KEVIN PATRICK MURRAY** and **TIMOTHY ALAN DUGGER** did on or
5 about the 25th day of February 2021, commit the crime of POSSESSION OF ASSAULT
6 WEAPON, a FELONY violation of section 30605(a) of the California Penal Code in that said
7 defendants did unlawfully possess an assault weapon, to wit, DPMS Panther Arms AR-15.
8

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

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

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

13 Executed on April 25, 2021 in Ukiah, California.
14

15
16 
17 C. DAVID EYSTER
18 District Attorney

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

21 "(a) The names and addresses of persons, other than the defendant, he or she intends
22 to call as witnesses at the trial, together with any relevant written or recorded statements of
23 those persons, or reports of the statements of those persons, including any reports of
24 statements of experts made in connection with the case, and including the results of physical
25 or mental examinations, scientific tests, experiments, or comparisons which the defendant
26 intends to offer in evidence at the trial."
27

28 "(b) Any real evidence which the defendant intends to offer in evidence at the trial."