

FILED

JAN 22 2021

CLERK OF MENDOCINO COUNTY
SUPERIOR COURT OF CALIFORNIA
Roger Corbett

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

9 Attorneys for Plaintiffs

10 **SUPERIOR COURT OF CALIFORNIA**
11 **COUNTY OF MENDOCINO**

12 THE PEOPLE OF THE STATE OF
13 CALIFORNIA

14 Plaintiffs,

15 v.

16 KEVIN PATRICK MURRAY,

17 Defendant.

SCUK-CRCR-21-37371-001

**COMPLAINT-CRIMINAL
FELONY**

[Bail Schedule: \$140,000]

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

20 **COUNT ONE**

21 Said defendant **KEVIN PATRICK MURRAY** did on or about the 25th day of November
22 2020, commit the crime of **BURGLARY IN THE FIRST DEGREE**, a **FELONY** violation of
23 Section 459/460(a) of the California Penal Code, in that said defendant did then and there
24 enter an occupied motel room located at 693 South Orchard Avenue in Ukiah, California, said
25 room occupied by a female with the initials S.Y., with the intent to commit larceny or a felony
26 therein. [first entry: key card]
27
28

1 NOTICE: The above offense is a serious felony within the meaning of Penal Code
2 Section 1192.7(c).

3 **FIRST SPECIAL ALLEGATION**

4 It is further alleged that during the commission of the aforementioned burglary the
5 motel room was occupied, within the meaning of Penal Code section 667.5(c)(21).
6

7 NOTICE: The First Special Allegation, if found true, converts the burglary charged in
8 Count One to a violent felony, within the meaning of Penal Code section 667.5(c)(21).

9 **COUNT TWO**

10 Said defendant **KEVIN PATRICK MURRAY** did on or about the 25th day of November
11 2020, commit the crime of BURGLARY IN THE FIRST DEGREE, a FELONY violation of
12 Section 459/460(a) of the California Penal Code, in that said defendant did then and there
13 enter an occupied motel room located at 693 South Orchard Avenue in Ukiah, California, said
14 room occupied by a female with the initials S.Y., with the intent to commit a felony therein.
15 [second entry].
16

17 NOTICE: The above offense is a serious felony within the meaning of Penal Code
18 Section 1192.7(c).
19

20 **SECOND SPECIAL ALLEGATION**

21 It is further alleged that during the commission of the aforementioned burglary the
22 motel room was occupied, within the meaning of Penal Code section 667.5(c)(21).
23

24 NOTICE: The ^{second} ~~First~~ Special Allegation, if found true, converts the burglary charged in
25 Count ~~One~~ ^{two} to a violent felony, within the meaning of Penal Code section 667.5(c)(21).
26

27 **COUNT THREE**

28 Said defendant **KEVIN PATRICK MURRAY** did on or about the 25th day of November
2020, commit the crime of VIOLATION OF CIVIL RIGHTS, a FELONY violation of section

1 422.6(a) of the California Penal Code, in that said defendant did willfully and unlawfully, under
2 color of law and by means of implied or express force or threat of force, willfully intimidate and
3 threaten another person in the free exercise of civil rights because of actual or perceived
4 characteristics of the victim, to wit, gender, race or ethnicity, and/or nationality.

5
6 **COUNT FOUR**

7 Said defendant **KEVIN PATRICK MURRAY** did on or about the 25th day of November
8 2020, commit the crime of SEXUAL BATTERY, a FELONY violation of Section 243.4(d)(1) of
9 the California Penal Code, in that said defendant did then and there willfully and unlawfully, by
10 means of words, act, or the implied or express authority of the defendant, force a female, to
11 wit, S.Y., to touch the defendant's penis against her will, for the purpose of sexual arousal,
12 sexual gratification, or sexual abuse.

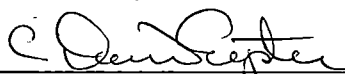
13
14 **COUNT FIVE**

15 Said defendant **KEVIN PATRICK MURRAY** did on or about the 1st day of December
16 2020, commit the crime of UNLAWFUL POSSESSION OF METHAMPHETAMINE, a
17 MISDEMEANOR violation of Section 11377(a) of the California Health and Safety Code, in
18 that said defendant was in unlawful possession of a usable quantity of controlled substances,
19 to wit, methamphetamine.

20
21 The offenses charged in the **FIVE COUNTS** of this complaint were of the same class of
22 crime or connected together in their commission.

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

24 I declare under penalty of perjury that the foregoing is true and correct, executed this
25 22nd day of January 2021 in the City of Ukiah, County of Mendocino, State of California.

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27 
28 C. DAVID EYSTER
District Attorney

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

3 "(a) The names and addresses of persons, other than the defendant, he or she intends
4 to call as witnesses at the trial, together with any relevant written or recorded statements of
5 those persons, or reports of the statements of those persons, including any reports of
6 statements of experts made in connection with the case, and including the results of physical
7 or mental examinations, scientific tests, experiments, or comparisons which the defendant
8 intends to offer in evidence at the trial."
9

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