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Clerk of the Superior Court

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By: C. Flores, Deputy

8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 SAN DIEGO SUPERIOR COURT

11
12
13 THE PEOPLE OF THE STATE OF
CALIFORNIA ,

14 Plaintiff,

15 v.

16
17 KEVIN CHRISTOPHER BOLLAERT
(DOB: 6/27/1986),

18 Defendant.
19

Case No.

COMPLAINT [FELONY]

20
21
22 The Attorney General of the State of California hereby accuses Kevin **BOLLAERT** of the
23 following criminal offenses:

24 **Count 1**

25 In and between December 2, 2013 and September 17, 2013, in the County of San Diego the
26 crime of Conspiracy, in violation of Penal Code section 182, (a)(1) a felony, was committed by
27 Kevin **BOLLAERT** who did unlawfully conspire together with another person and persons
28 whose identity is unknown to commit the crime of Identity Theft, in violation of Penal Code

1 section 530.5, a felony; that pursuant to and for the purpose of carrying out the objectives and
2 purposes of the aforesaid conspiracy, that Kevin **BOLLAERT** and others committed the
3 following overt acts at and in the County of San Diego, overt act(s):

4 **Overt Act 1**

5 Between December 2, 2012 and September 17, 2013, Kevin **BOLLAERT** was the
6 administrator of a website called "ugotposted.com".

7 **Overt Act 2**

8 Between December 2, 2012 and September 17, 2013, Kevin **BOLLAERT**, with the
9 assistance of known and unknown conspirators, posted Ten Thousand One Hundred Seventy
10 (10,170) private photographs containing nude and explicit images of individuals who did not give
11 permission for their private images to be posted online.

12 **Overt Act 3**

13 Between December 2, 2012 and September 17, 2013, Kevin **BOLLAERT** posted the
14 personal identifying information of over ten thousand individuals in conjunction with private
15 images of those individuals without their permission.

16 **Overt Act 4**

17 On July 12, 2013, Kevin **BOLLAERT** failed to remove images of Jane Doe #6 following
18 the receipt of an email from Jane Doe #6 stating that due to private images of her, along with her
19 personal identifying information, being posted on ugotposted.com she was "...scared for my life!
20 People are calling my work place and they obtained the information from this site! I did not give
21 permission for anyone to put up those pictures or my personal information. I have contacted the
22 police but these pictures need to come down! Please!".

23 **Overt Act 5**

24 On July 17, 2013, Kevin **BOLLAERT** failed to remove images of Jane Doe #8 following
25 the receipt of an email from Jane Doe #8 requesting her private information and images be taken
26 down from ugotposted.com stating she was "getting nonstop harassing messages..."

1 **Overt Act 6**

2 Between June 20, 2013 and August 26, 2013, Kevin **BOLLAERT** received and reviewed
3 over 2000 emails from individuals requesting their personal identifying information and images
4 be removed from ugotposted.com.

5 **Overt Act. 7**

6 In October of 2012 Kevin **BOLLAERT** with the assistance of known and unknown
7 conspirators opened and updated an online account called changemyreputation.com.

8 **Overt Act 8**

9 Between December 2, 2012 and September 17, 2013, Kevin **BOLLAERT** collected in
10 excess of \$10,000(ten thousand dollars) via changemyreputation.com from individuals paying to
11 have their personal identifying information and images removed from ugotposted.com.

12 **Count 2**

13 On or about April 4, 2013, in the County of San Diego, the crime of Identity Theft, in
14 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
15 did willfully and unlawfully obtain personal identifying information of Jane Doe #1 and used that
16 information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane Doe
17 # 1.

18 **Count 3**

19 On or about April 4, 2013, in the County of San Diego, the crime of Identity Theft, in
20 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
21 did willfully and unlawfully obtain personal identifying information of Jane Doe #1 and used that
22 information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods, services,
23 and money, without the consent of Jane Doe #1.

24 **Count 4**

25 On or about April 4, 2013, in the County of San Diego, the crime of Extortion, in violation
26 of Penal Code Section 520, a felony was committed by Kevin **BOLLAERT**, who extorted money
27 and or other property from Jane Doe # 1 by means of threat such as is mentioned in Penal Code
28 Section 519, to wit, to expose, or to impute to her any disgrace or expose any secret affecting her.

1 **Count 5**

2 On or about April 18, 2013, in the County of San Diego, the crime of Identity Theft, in
3 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
4 did willfully and unlawfully obtain personal identifying information of Jane Doe #2 and used that
5 information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane Doe
6 # 2.

7 **Count 6**

8 On or about April 18, 2013, in the County of San Diego, the crime of Identity Theft, in
9 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
10 did willfully and unlawfully obtain personal identifying information of Jane Doe #2 and used that
11 information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods, services,
12 and money, without the consent of Jane Doe #2.

13 **Count 7**

14 On or about April 18, 2013, in the County of San Diego, the crime of Extortion, in violation of
15 Penal Code Section 520, a felony was committed by Kevin **BOLLAERT**, who extorted money
16 and or other property from Jane Doe #2 by means of threat such as is mentioned in Penal Code
17 Section 519, to wit, to expose, or to impute to her any disgrace or expose any secret affecting her.

18 **Count 8**

19 On or about April 29, 2013, in the County of San Diego, the crime of Identity Theft, in
20 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
21 did willfully and unlawfully obtain personal identifying information of Jane Doe #3 and used that
22 information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane Doe
23 #3.

24 **Count 9**

25 On or about April 29, 2013, in the County of San Diego, the crime of Identity Theft, in
26 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
27 did willfully and unlawfully obtain personal identifying information of Jane Doe #3 and used that
28

1 information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods, services,
2 and money, without the consent of Jane Doe #3.

3 **Count 10**

4 On or about May 13, 2013, in the County of San Diego, the crime of Identity Theft, in
5 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
6 did willfully and unlawfully obtain personal identifying information of Jane Doe #4 and used that
7 information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane Doe
8 #4.

9 **Count 11**

10 On or about May 13, 2013, in the County of San Diego, the crime of Identity Theft, in
11 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
12 did willfully and unlawfully obtain personal identifying information of Jane Doe #4 and used that
13 information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods, services,
14 and money, without the consent of Jane Doe #4.

15 **Count 12**

16 On or about July 6, 2013, in the County of San Diego, the crime of Identity Theft, in
17 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
18 did willfully and unlawfully obtain personal identifying information of Jane Doe #5 and used that
19 information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane Doe
20 #5.

21 **Count 13**

22 On or about July 6, 2013, in the County of San Diego, the crime of Identity Theft, in
23 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
24 did willfully and unlawfully obtain personal identifying information of Jane Doe #5 and used that
25 information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods, services,
26 and money, without the consent of Jane Doe #5.

1 **Count 14**

2 On or about July 12, 2013, in the County of San Diego, the crime of Identity Theft, in
3 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
4 did willfully and unlawfully obtain personal identifying information of Jane Doe #6 and used that
5 information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane Doe
6 #6.

7 **Count 15**

8 On or about July 12, 2013, in the County of San Diego, the crime of Identity Theft, in
9 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
10 did willfully and unlawfully obtain personal identifying information of Jane Doe #6 and used that
11 information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods, services,
12 and money, without the consent of Jane Doe #6.

13 **Count 16**

14 On or about July 16, 2013, in the County of San Diego, the crime of Identity Theft, in
15 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
16 did willfully and unlawfully obtain personal identifying information of Jane Doe #7 and used that
17 information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane Doe
18 #7.

19 **Count 17**

20 On or about July 16, 2013, in the County of San Diego, the crime of Identity Theft, in
21 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
22 did willfully and unlawfully obtain personal identifying information of Jane Doe #7 and used that
23 information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods, services,
24 and money, without the consent of Jane Doe #7.

25 **Count 18**

26 On or about August 4, 2013, in the County of San Diego, the crime of Identity Theft, in
27 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
28 did willfully and unlawfully obtain personal identifying information of Jane Doe #8 and used that

1 information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane Doe
2 #8.

3 **Count 19**

4 On or about August 4, 2013, in the County of San Diego, the crime of Identity Theft, in
5 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
6 did willfully and unlawfully obtain personal identifying information of Jane Doe #8 and used that
7 information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods, services,
8 and money, without the consent of Jane Doe #8.

9 **Count 20**

10 On or about August 6, 2013, in the County of San Diego, the crime of Identity Theft, in
11 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
12 did willfully and unlawfully obtain personal identifying information of Jane Doe #9 and used that
13 information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane Doe
14 #9.

15 **Count 21**

16 On or about August 6, 2013, in the County of San Diego, the crime of Identity Theft, in
17 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
18 did willfully and unlawfully obtain personal identifying information of Jane Doe #9 and used that
19 information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods, services,
20 and money, without the consent of Jane Doe #9.

21 **Count 22**

22 On or about August 13, 2013, in the County of San Diego, the crime of Identity Theft, in
23 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
24 did willfully and unlawfully obtain personal identifying information of Jane Doe #10 and used
25 that information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane
26 Doe #10.

1 **Count 23**

2 On or about August 13, 2013, in the County of San Diego, the crime of Identity Theft, in
3 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
4 did willfully and unlawfully obtain personal identifying information of Jane Doe #10 and used
5 that information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods,
6 services, and money, without the consent of Jane Doe #10.

7 **Count 24**

8 On or about August 26, 2013, in the County of San Diego, the crime of Identity Theft, in
9 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
10 did willfully and unlawfully obtain personal identifying information of Jane Doe #11 and used
11 that information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane
12 Doe #11.

13 **Count 25**

14 On or about August 26, 2013, in the County of San Diego, the crime of Identity Theft, in
15 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
16 did willfully and unlawfully obtain personal identifying information of Jane Doe #11 and used
17 that information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods,
18 services, and money, without the consent of Jane Doe #11.

19 **Count 26**

20 On or about September 4, 2013, in the County of San Diego, the crime of Identity Theft, in
21 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
22 did willfully and unlawfully obtain personal identifying information of Jane Doe #12 and used
23 that information for an unlawful purpose to wit, to harass and annoy, without the consent of Jane
24 Doe #12.

25 **Count 27**

26 On or about September 4, 2013, in the County of San Diego, the crime of Identity Theft, in
27 violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**, who
28 did willfully and unlawfully obtain personal identifying information of Jane Doe #12 and used

1 that information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods,
2 services, and money, without the consent of Jane Doe #12.

3 **Count 28**

4 On or about September 10, 2013, in the County of San Diego, the crime of Identity Theft,
5 in violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**,
6 who did willfully and unlawfully obtain personal identifying information of Jane Doe #13 and
7 used that information for an unlawful purpose to wit, to harass and annoy, without the consent of
8 Jane Doe #13.

9 **Count 29**

10 On or about September 10, 2013, in the County of San Diego, the crime of Identity Theft,
11 in violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**,
12 who did willfully and unlawfully obtain personal identifying information of Jane Doe #13 and
13 used that information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods,
14 services, and money, without the consent of Jane Doe #13.

15 **Count 30**

16 On or about September 12, 2013, in the County of San Diego, the crime of Identity Theft,
17 in violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**,
18 who did willfully and unlawfully obtain personal identifying information of Jane Doe #14 and
19 used that information for an unlawful purpose to wit, to harass and annoy, without the consent of
20 Jane Doe #14.

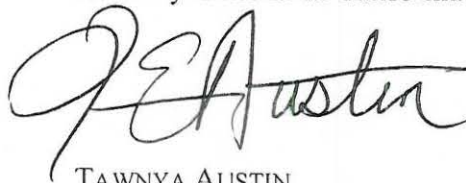
21 **Count 31**

22 On or about September 12, 2013, in the County of San Diego, the crime of Identity Theft,
23 in violation of Penal Code section 530.5(a), a felony, was committed by Kevin **BOLLAERT**,
24 who did willfully and unlawfully obtain personal identifying information of Jane Doe #14 and
25 used that information for an unlawful purpose, and to obtain, and attempt to obtain credit, goods,
26 services, and money, without the consent of Jane Doe #14.

1 Dated: December 10, 2013

Respectfully Submitted,

2 KAMALA D. HARRIS
3 Attorney General of California

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5 TAWNYA AUSTIN
6 Deputy Attorney General
7 *Attorneys for the People of the State of*
8 *California*