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8 Attorneys for Plaintiff

9 SUPERIOR COURT OF CALIFORNIA
10 COUNTY OF SACRAMENTO
11

12 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

13 Plaintiff,

14 v.

15 **KARI LYNN DOHN,**

16 Defendant.
17

CASE NO. 04F02056

COMPLAINT (FELONY)

Arrairnment

DATE: March 3, 2004

TIME: 10:30 a.m.

DEPT: 8

18 I, the undersigned, say on information and belief, that in the County of Sacramento, State
19 of California:

20 COUNT ONE

21 That on or about April 23, 2002, defendant KARI LYNN DOHN did commit a FELONY,
22 namely, a violation of Section 134 of the Penal Code, PREPARING FALSE DOCUMENTARY
23 EVIDENCE, in that she did unlawfully prepare a false or ante-dated book, paper, record, instrument
24 in writing, or other matter and thing, with intent to produce it, or allow it to be produced for a
25 fraudulent or deceitful purpose, as genuine or true, upon a trial, proceeding, or inquiry whatever,
26 authorized by law.

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1 **COUNT TWO**

2 For a further and separate cause of action, being a different offense from, but connected
3 in its commission with the charge set forth in Count One hereof, complainant further complains and
4 says:

5 That on or about April 23,2002, defendant KARI LYNN DOHN did commit a FELONY,
6 namely, a violation of Section 6200 of the Government Code, ALTERATION OF GOVERNMENT
7 RECORDS, in that she was an officer having custody of a record, map, book, or paper filed or
8 deposited in a public office, or placed in the defendant's hands and, as to the whole or part thereof,
9 did steal, remove, secrete, destroy, mutilate, deface, alter or falsify said document.

10 **COUNT THREE**

11 For a further and separate cause of action, being a different offense from, but connected
12 in its commission with the charges set forth in Counts One and Two hereof, complainant complains
13 and says:

14 That on or about April 25,2002, defendant KARI LYNN DOHN did commit a FELONY,
15 namely, a violation of Section 134 of the Penal Code, PREPARING FALSE DOCUMENTARY
16 EVIDENCE, in that she did unlawfully prepare a false or ante-dated book, paper, record, instrument
17 in writing, or other matter and thing, with intent to produce it, or allow it to be produced for a
18 fraudulent or deceitful purpose, as genuine or true, upon a trial, proceeding, or inquiry whatever,
19 authorized by law.

20 **COUNT FOUR**

21 For a further and separate cause of action, being a different offense from, but connected
22 in its commission with the charges set forth in Counts One through Three hereof, complainant
23 complains and says:

24 That on or about April 25,2002, defendant KARI LYNN DOHN did commit a FELONY,
25 namely, a violation of Section 6200 of the Government Code, ALTERATION OF GOVERNMENT
26 RECORDS, in that she was an officer having custody of a record, map, book, or paper filed or
27 deposited in a public office, or placed in the defendant's hands and, as to the whole or part thereof,
28 did steal, remove, secrete, destroy, mutilate, deface, alter or falsify said document.

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COUNT FIVE

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Four hereof, complainant complains and says:

That on or about April 25,2002, defendant KARI LYNN DOHN did commit a FELONY, namely, a violation of Section 134 of the Penal Code, PREPARING FALSE DOCUMENTARY EVIDENCE, in that she did unlawfully prepare a false or ante-dated book, paper, record, instrument in writing, or other matter and thing, with intent to produce it, or allow it to be produced for a fraudulent or deceitful purpose, as genuine or true, upon a trial, proceeding, or inquiry whatever, authorized by law.

COUNT SIX

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Five hereof, complainant complains and says:

That on or about April 25,2002, defendant KARI LYNN DOHN did commit a FELONY, namely, a violation of Section 6200 of the Government Code, ALTERATION OF GOVERNMENT RECORDS, in that she was an officer having custody of a record, map, book, or paper filed or deposited in a public office, or placed in the defendant's hands and, as to the whole or part thereof, did steal, remove, secrete, destroy, mutilate, deface, alter or falsify said document.

COUNT SEVEN

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Six hereof, complainant complains and says:

That on or about May 7,2002, defendant KARI LYNN DOHN did commit a FELONY, namely, a violation of Section 134 of the Penal Code, PREPARING FALSE DOCUMENTARY EVIDENCE, in that she did unlawfully prepare a false or ante-dated book, paper, record, instrument in writing, or other matter and thing, with intent to produce it, or allow it to be produced for a

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1 fraudulent or deceitful purpose, as genuine or true, upon a trial, proceeding, or inquiry whatever,
2 authorized by law.

3 **COUNT EIGHT**

4 For a further and separate cause of action, being a different offense from, but connected
5 in its commission with the charges set forth in Counts One through Seven hereof, complainant
6 complains and says:

7 That on or about May 7,2002, defendant KARI LYNN DOHN did commit a FELONY,
8 namely, a violation of Section 6200 of the Government Code, ALTERATION OF GOVERNMENT
9 RECORDS, in that she was an officer having custody of a record, map, book, or paper filed or
10 deposited in a public office, or placed in the defendant's hands and, as to the whole or part thereof,
11 did steal, remove, secrete, destroy, mutilate, deface, alter or falsify said document.

12 **COUNT NINE**

13 For a further and separate cause of action, being a different offense from, but connected
14 in its commission with the charges set forth in Counts One through Eight hereof, complainant
15 complains and says:

16 That on or about May 7,2002, defendant KARI LYNN DOHN did commit a FELONY,
17 namely, a violation of Section 134 of the Penal Code, PREPARING FALSE DOCUMENTARY
18 EVIDENCE, in that she did unlawfully prepare a false or ante-dated book, paper, record, instrument
19 in writing, or other matter and thing, with intent to produce it, or allow it to be produced for a
20 fraudulent or deceitful purpose, as genuine or true, upon a trial, proceeding, or inquiry whatever,
21 authorized by law.

22 **COUNT TEN**

23 For a further and separate cause of action, being a different offense from, but connected
24 in its commission with the charges set forth in Counts One through Nine hereof, complainant
25 complains and says:

26 That on or about May 7,2002, defendant KARI LYNN DOHN did commit a FELONY,
27 namely, a violation of Section 6200 of the Government Code, ALTERATION OF GOVERNMENT
28 RECORDS, in that she was an officer having custody of a record, map, book, or paper filed or

1 deposited in a public office, or placed in the defendant's hands and, as to the whole or part thereof,
2 did steal, remove, secrete, destroy, mutilate, deface, alter or falsify said document.

3 **COUNT ELEVEN**

4 For a further and separate cause of action, being a different offense from, but connected
5 in its commission with the charges set forth in Counts One through Ten hereof, complainant
6 complains and says:

7 That on or about May 14, 2002, defendant KARI LYNN DOHN did commit a FELONY,
8 namely, a violation of Section 134 of the Penal Code, PREPARING FALSE DOCUMENTARY
9 EVIDENCE, in that she did unlawfully prepare a false or ante-dated book, paper, record, instrument
10 in writing, or other matter and thing, with intent to produce it, or allow it to be produced for a
11 fraudulent or deceitful purpose, as genuine or true, upon a trial, proceeding, or inquiry whatever,
12 authorized by law.


13 **COUNT TWELVE**

14 For a further and separate cause of action, being a different offense from, but connected
15 in its commission with the charges set forth in Counts One through Eleven hereof, complainant
16 complains and says:

17 That on or about May 14, 2002, defendant KARI LYNN DOHN did commit a FELONY,
18 namely, a violation of Section 6200 of the Government Code, ALTERATION OF GOVERNMENT
19 RECORDS, in that she was an officer having custody of a record, map, book, or paper filed or
20 deposited in a public office, or placed in the defendant's hands and, as to the whole or part thereof,
21 did steal, remove, secrete, destroy, mutilate, deface, alter or falsify said document.

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

23 Executed this 2d day of March, 2004, at Sacramento, California.


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26 BRETT H. MORGAN
27 Deputy Attorney General
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DISCOVERY REQUEST

Pursuant to the provisions of Penal Code sections 1054.5(b) and 1054.3, it is hereby requested that all materials and information as set forth in Penal Code section 1054.3(a) and (b) be provided to the People.

DATED: March 2, 2004


BRETT H. MORGAN
Deputy Attorney General 