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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN DIEGO
12 CENTRAL DIVISION
13

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15 **PEOPLE OF THE STATE OF CALIFORNIA,**

Case No. SCD235490

16 Plaintiff,

FELONY COMPLAINT

17 v.

18 **ROBERT EARL FILNER,**

19 Defendant.
20

21 The undersigned, certifying upon information and belief, complains that in the County of
22 San Diego, State of California, the defendant did commit the following crime(s):

23 **COUNT 1 - FALSE IMPRISONMENT BY VIOLENCE, FRAUD,**
24 **MENACE, AND DECEIT**

25 On or about March 6, 2013, the Defendant, ROBERT EARL FILNER, did unlawfully and
26 intentionally violate the personal liberty of another, that is, JANE DOE 1, said violation being
27 effected by violence, menace, fraud, and deceit in violation of PENAL CODE SECTIONS 236
28 and 237, a felony.

1 **COUNT 2 - BATTERY**

2 On or about April 6, 2013, the Defendant, ROBERT EARL FILNER, did willfully and
3 unlawfully use force and violence upon the person of another, that is, JANE DOE 2, in violation
4 of PENAL CODE SECTIONS 242 and 243, subdivision (a), a misdemeanor.

5 **COUNT 3 - BATTERY**

6 On or about May 25, 2013, the Defendant, ROBERT EARL FILNER, did willfully and
7 unlawfully use force and violence upon the person of another, that is, JANE DOE 3, in violation
8 of PENAL CODE SECTIONS 242 and 243, subdivision (a), a misdemeanor.

9 **MARSY'S LAW AND RELATED VICTIM RIGHTS**

10 Information contained in the reports being distributed as discovery in this case may contain
11 confidential information protected by Marsy's Law and the amendments to the State of California
12 Constitution, Section 28. Any victims in any above-referenced charge are entitled to be safe and
13 free from intimidation, harassment and abuse. The defendant, defense counsel and any other
14 person acting on behalf of the defendant are admonished not to use any information contained in
15 the reports to harass any victims or the victims' family and to not disclose any information that is
16 otherwise privileged and confidential by law. Additionally, it is a misdemeanor violation of
17 California Penal Code section 1054.2, subdivision (a)(3), to disclose the address and telephone
18 number of a victim or witness, provided in discovery, to a defendant, defendant's family member
19 or anyone else. Note exceptions provided in California Penal Codes section 1054.2, subdivisions
20 (a)(1), (2).

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1 REQUEST FOR DISCOVERY

2 Pursuant to Penal Code section 1054.5, subdivision (b), the People hereby informally
3 request that defendant's counsel provide discovery to the People as required by Penal Code
4 section 1054.3.

5 I declare under penalty of perjury that the foregoing is true and correct and that this
6 Complaint consists of Three Counts. Executed this 15th day of October, 2013, at San Diego,
7 California.

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MELISSA MANDEL
12 Supervising Deputy Attorney General
Attorneys for Plaintiff

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