

SUPERIOR COURT OF CALIFORNIA, COUNTY OF HUMBOLDT  
HUMBOLDT SUPERIOR COURT DISTRICT

|  |   |                            |
|--|---|----------------------------|
| THE PEOPLE OF THE STATE OF CALIFORNIA, | ) | COURT CASE NO              |
|  | ) |                            |
| Plaintiff                              | ) |                            |
|  | ) |                            |
| vs.                                    | ) |                            |
|  | ) | FELONY COMPLAINT           |
| Kayla Muriel Brown                     | ) |                            |
|  | ) |                            |
| Defendant                              | ) | DA CASE NO 2015-00-0001732 |

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The undersigned is informed and believes that:

COUNT 1

On or about June 1, 2014 through January 6, 2015, in the above named judicial district, the crime of MEETING MINOR FOR LEWD PURPOSES, in violation of Penal Code SECTION 288.4(b), a felony, was committed by Kayla Muriel Brown, who did unlawfully, and motivated by an unnatural and abnormal sexual interest in children, arrange a meeting with Jane Doe, a minor and a person defendant believed to be a minor, for the purpose of exposing the genitals and pubic and rectal area of Jane Doe and defendant, and to engage in lewd and lascivious behavior, and did go to the arranged meeting place at and about the arranged time.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

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COUNT 2

On or about December 7, 2014, in the above named judicial district, the crime of SEXUAL PENETRATION/FOREIGN OBJECT-VICTIM UNDER 16 YEARS, in violation of Penal Code SECTION 289(i), a felony, was committed by Kayla Muriel Brown, who being over the age of 21 years, committed an act of sexual penetration against Jane Doe who was under the age of 16 years.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

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COUNT 3

On or about June 1, 2014 through January 6, 2015, in the above named judicial district, the crime of CONTACT WITH MINOR FOR SEXUAL OFFENSE, in violation of Penal Code SECTION 288.3(a), a felony, was committed by Kayla Muriel Brown, who did unlawfully contact and communicate with a minor, Jane Doe, knowing that Jane Doe was a minor, with the intent to commit an offense specified in Penal Code Section 288 involving Jane Doe, a minor.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

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COUNT 4

On or about June 1, 2014 through January 6, 2015, in the above named judicial district, the crime of ANNOY/MOLEST A CHILD UNDER 18 YEARS OLD, in violation of Penal Code SECTION 647.6(a)(1), a misdemeanor, was committed by Kayla Muriel Brown, who did unlawfully annoy and molest a child, Jane Doe, under the age of eighteen years.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

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REQUEST FOR DISCOVERY

Pursuant to Penal Code Sections 1054.3 and 1054.4(b), the People of the State of California are informally requesting the following desired materials and information:

- (a) The names and address of persons, other than the defendant, you intend to call as witnesses at trial, together with any relevant written or recorded statements of those persons, or reports of the statements of experts made in connection with the case, and including the results of physical or mental examinations, scientific tests, experiments or comparisons which the defendant intends to offer in evidence at the trial;
- (b) Any real evidence which the defendant intends to offer in evidence at the trial.

\* \* \* \* \*

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 4 COUNT(S).

Executed at Eureka, California, on March 10,  
2015.  
Brie Bennett

DECLARANT AND COMPLAINANT