

GERALD T. SHEA
DISTRICT ATTORNEY
STATE BAR #62745
COUNTY OF SAN LUIS OBISPO
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- Court copy
- DA copy
- Probation copy
- Defendant copy
- Restitution
- Sub Fel/lss Misd

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SAN LUIS OBISPO SUPERIOR COURT
C. Morascl
C. Morascl, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO
DEPARTMENT NOT ASSIGNED

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs

TODD RUSSELL DOLEZAL

DOB: 09/02/64 ID#: 99435 MNID: D000050737

LARISSA PAIGE LANGLEY

DOB: 07/24/83 ID#: 405174 MNID: D000367724

aka LARISSA PAIGE GARCIA

Defendant(s).

) DA CASE NO: 11-983

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) COURT NO: *F457098*

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) COMPLAINT

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The District Attorney of the San Luis Obispo County, California, hereby accuses the above named defendant(s) of the following criminal offenses:

Count 1

On and between FEBRUARY 18, 2009 to NOVEMBER 19, 2009, in the County of San Luis Obispo, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of Penal Code section 182(A)(1), a FELONY, was committed by TODD RUSSELL DOLEZAL AND LARISSA PAIGE LANGLEY, who did willfully and unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **UNLAWFUL BAIL SOLICITATION IN JAIL, UNLAWFUL CONTACT FOR BAIL SOLICITATION, FAILURE TO MAINTAIN RECORDS OF BAIL SOLICITATION AND UNLAWFUL SOLICITATION OF BAIL**, in violation of Sections **CCR10-2074, CCR10-2079.1, CCR10-2100 AND PC160(A) of the CALIFORNIA CODE OF REGULATIONS AND PENAL code, FELONIES AND A MISDEMEANOR**; pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendants committed the following overt act(s) in the County of San Luis Obispo.

Overt Act 1

That on or about February 18, 2009, Defendant Dolezal directed defendant L. Langley to go to the San Luis Obispo County Jail and to meet with Andrew Truesdale.

Overt Act 2

That on or about February 18, 2009, Defendant L. Langley went to the San Luis Obispo County Jail and met with Andrew Truesdale.

Overt Act 3

That on or about February 18, 2009, Defendant L. Langley called Andrew Truesdale's mother Shelly Watt on her cell phone.

Overt Act 4

That on or about February 18, 2009, Defendant L. Langley spoke with Andrew Truesdale and Shelly Watt on the telephone.

Overt Act 5

That on or about May 12, 2009, Defendant L. Langley went to the San Luis Obispo County Jail and met with Jeni Maldonado.

Overt Act 6

That on or about April 10, 2009, Defendant L. Langley went to the San Luis Obispo County Jail and met with Kathryn Schildwatcher.

Overt Act 7

That on or about June 2, 2009, Defendant L. Langley went to the San Luis Obispo county Jail and met with Kelli Murphy.

Overt Act 8

That on or about June 2, 2009, Defendant L. Langley, while at the San Luis Obispo County Jail, requested to speak with inmates John Fischer and Anthony Farley.

Overt Act 9

That on or about November 18, 2009, Defendant Dolezal directed C. Langley to go to the San Luis Obispo County Jail and to meet with Thomas Seymour.

Overt Act 10

That on or about November 18, 2009, Defendant Dolezal directed C. Langley to go to the San Luis Obispo County Jail and to meet with Joshua Gonzalez.

Count 2

On or about FEBRUARY 18, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL BAIL SOLICITATION IN JAIL, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2074, a FELONY, was committed by TODD RUSSELL DOLEZAL AND LARISSA PAIGE LANGLEY, who did willfully and unlawfully solicit ANDREW TRUESDALE for bail while in a prison, jail, and other place of detention of persons, court and public institution connected with the administration of justice; and in the halls or corridors adjacent thereto.

Count 3

On or about FEBRUARY 18, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL CONTACT FOR BAIL SOLICITATION, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2079.1, a FELONY, was committed by TODD RUSSELL DOLEZAL AND LARISSA PAIGE LANGLEY, who did willfully and unlawfully contact ANDREW TRUESDALE to solicit bail without having received a previous bona fide request for bail services from a person specified in California Code of Regulations Title 10, Section 2079(b) or (c).

Count 4

On or about FEBRUARY 18, 2009, in the County of San Luis Obispo, the crime of FAILURE TO MAINTAIN RECORDS OF BAIL SOLICITATION, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2100, a FELONY, was committed by TODD RUSSELL DOLEZAL AND LARISSA PAIGE LANGLEY, who did willfully and unlawfully fail to keep a complete record of the full name and address of the person furnishing information leading to the solicitation or negotiation of the bail, the date and time such information was received, the manner in which it was received, the connection or relationship to the arrestee of the person other than the arrestee furnishing such information, and the name of the person receiving such information as to the bail transaction.

Count 5

On or about APRIL 10, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL BAIL SOLICITATION IN JAIL, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2074, a FELONY, was committed by TODD RUSSELL DOLEZAL AND LARISSA PAIGE LANGLEY, who did willfully and unlawfully solicit KATHRYN SCHILDWACHTER for bail while in a prison, jail, and other place of detention of persons, court and public institution connected with the administration of justice; and in the halls or corridors adjacent thereto.

Count 6

On or about APRIL 10, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL CONTACT FOR BAIL SOLICITATION, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2079.1, a FELONY, was committed by TODD RUSSELL DOLEZAL AND LARISSA PAIGE LANGLEY, who did willfully and unlawfully contact KATHRYN SCHILDWACHTER to solicit bail without having received a previous bona fide request for bail services from a person specified in California Code of Regulations Title 10, Section 2079(b) or (c).

Count 7

On or about MAY 12, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL BAIL SOLICITATION IN JAIL, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2074, a FELONY, was committed by TODD RUSSELL DOLEZAL AND LARISSA PAIGE LANGLEY, who did willfully and unlawfully solicit JENI MALDONADO for bail while in a prison, jail, and other place of detention of persons, court and public institution connected with the administration of justice; and in the halls or corridors adjacent thereto.

Count 8

On or about MAY 12, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL CONTACT FOR BAIL SOLICITATION, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2079.1, a FELONY, was committed by TODD RUSSELL DOLEZAL AND LARISSA PAIGE LANGLEY, who did willfully and unlawfully contact JENI MALDONADO to solicit bail without having received a previous bona fide request for bail services from a person specified in California Code of Regulations Title 10, Section 2079(b) or (c).

Count 9

On or about JUNE 2, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL BAIL SOLICITATION IN JAIL, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2074, a FELONY, was committed by TODD RUSSELL DOLEZAL AND LARISSA PAIGE LANGLEY, who did willfully and unlawfully solicit KELLI MURPHY for bail while in a prison, jail, and other place of detention of persons, court and public institution connected with the administration of justice; and in the halls or corridors adjacent thereto.

Count 10

On or about JUNE 2, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL CONTACT FOR BAIL SOLICITATION, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2079.1, a FELONY, was committed by TODD RUSSELL DOLEZAL AND LARISSA PAIGE LANGLEY, who did willfully and unlawfully contact KELLI MURPHY to solicit bail without having received a previous bona fide request for bail services from a person specified in California Code of Regulations Title 10, Section 2079(b) or (c).

Count 11

On or about NOVEMBER 18, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL BAIL SOLICITATION IN JAIL, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2074, a FELONY, was committed by TODD RUSSELL DOLEZAL, who did willfully and unlawfully solicit THOMAS SEYMOUR for bail while in a prison, jail, and other place of detention of persons, court and public institution connected with the administration of justice; and in the halls or corridors adjacent thereto.

Count 12

On or about NOVEMBER 18, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL CONTACT FOR BAIL SOLICITATION, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2079.1, a FELONY, was committed by TODD RUSSELL DOLEZAL, who did willfully and unlawfully contact THOMAS SEYMOUR to solicit bail without having received a previous bona fide request for bail services from a person specified in California Code of Regulations Title 10, Section 2079(b) or (c).

Count 13

On or about NOVEMBER 18, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL BAIL SOLICITATION IN JAIL, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2074, a FELONY, was committed by TODD RUSSELL DOLEZAL, who did willfully and unlawfully solicit JOSHUA GONZALES for bail while in a prison, jail, and other place of detention of persons, court and public institution connected with the administration of justice; and in the halls or corridors adjacent thereto.

Count 14

On or about NOVEMBER 18, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL CONTACT FOR BAIL SOLICITATION, in violation of CALIFORNIA CODE OF REGULATIONS Title 10 section 2079.1, a FELONY, was committed by TODD RUSSELL DOLEZAL, who did willfully and unlawfully contact JOSHUA GONZALES to solicit bail without having received a previous bona fide request for bail services from a person specified in California Code of Regulations Title 10, Section 2079(b) or (c).

Count 15

On and between FEBRUARY 24, 2009 to MARCH 3, 2009, in the County of San Luis Obispo, the crime of UNLAWFUL SOLICITATION OF BAIL, in violation of Penal Code section 160(A), a MISDEMEANOR, was committed by TODD RUSSELL DOLEZAL, who being a bail licensee, did unlawfully employ, engage, solicit, pay and promise payment, compensation, consideration, and thing of value to a person incarcerated in a prison, jail, and other place of detention for the purpose of that person soliciting bail on his/her behalf.

PC 160 IS A VALID CRIMINAL CHARGE. THE LEGISLATURE INTENDED FOR THIS TO BE A CRIME AND IT IS DEFINED AS SUCH.

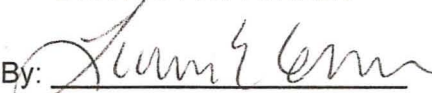
All of which is contrary to the statute in such cases made and provided, and against the peace and dignity of the People of the State of California.

I declare that an investigation has been conducted to determine if said Defendant(s) did commit the stated crime, which reports are attached hereto and incorporated herein by reference, and that the facts therein show probable cause that the said Defendant(s) did commit the crime. Your declarant requests the issuance of a Warrant of Arrest if said Defendant(s) do not appear voluntarily in response to an appearance letter.

Discovery Request: Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the people as required by Penal Code Section 1054.3.

On this day February 9, 2011, in the County of San Luis Obispo, I certify and declare under penalty of perjury that the foregoing is true and correct. This Complaint consists of 15 count(s).

GERALD T. SHEA
DISTRICT ATTORNEY

By: 

LOUISE E COMAR
Deputy District Attorney

Upon review of the reports attached and incorporated herein by reference, I find sufficient probable cause to warrant the defendant(s) continued detention.

DATED: _____

Judge of the Superior Court

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SUMMARY PAGE

<i>Cnt</i>	<i>Charge</i>	<i>Range</i>	<i>Defendant(s)</i>	<i>Special Allegation</i>	<i>Effect</i>
001	PC182(A)(1)	N/A	Dolezal, Todd R. Langley, Larissa P.		
002	CCR10-2074	1y/16-2-3	Dolezal, Todd R. Langley, Larissa P.		
003	CCR10-2079.1	1y/16-2-3	Dolezal, Todd R. Langley, Larissa P.		
004	CCR10-2100	1y/16-2-3	Dolezal, Todd R. Langley, Larissa P.		
005	CCR10-2074	1y/16-2-3	Dolezal, Todd R. Langley, Larissa P.		
006	CCR10-2079.1	1y/16-2-3	Dolezal, Todd R. Langley, Larissa P.		
007	CCR10-2074	1y/16-2-3	Dolezal, Todd R. Langley, Larissa P.		
008	CCR10-2079.1	1y/16-2-3	Dolezal, Todd R. Langley, Larissa P.		
009	CCR10-2074	1y/16-2-3	Dolezal, Todd R. Langley, Larissa P.		
010	CCR10-2079.1	1y/16-2-3	Dolezal, Todd R. Langley, Larissa P.		