

1 DAN DOW
DISTRICT ATTORNEY
2 STATE BAR # 237986
COUNTY OF SAN LUIS OBISPO
3 COURTHOUSE ANNEX, 4TH FLOOR
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ELECTRONICALLY
FILED
7/17/2026 11:56 AM

SAN LUIS OBISPO SUPERIOR COURT
By: T. Chavez,
Deputy Clerk

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8 SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO
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10
11 THE PEOPLE OF THE STATE OF CALIFORNIA

12 Plaintiff,

13 vs.

14 **DAVID ALLEN LEADER**

DOB: 07/20/1955 ID NO. D000388355

15
16 Defendant.
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COURT CASE NO. 25M-01717

SECOND AMENDED
(CONSOLIDATED) COMPLAINT

DA CASE NO. 079-707477

Appearance Date: July 22, 2026

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

21 Count 1

22 On or about October 17, 2024, in the County of San Luis Obispo, State of California, the
23 crime of Vandalism \$400.00 Or More in violation of PC594(b)(1), a Felony, was committed
24 in that DAVID ALLEN LEADER did maliciously and unlawfully deface, damage and destroy
25 real and personal property which belonged to another, in the amount of four hundred
26 dollars (\$400.00) or more.
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Count 2

On or about December 31, 2024, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 3

On or about January 1, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 4

On or about January 2, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 5

On or about January 3, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 6

On or about January 6, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 7

On or about January 10, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 8

On or about January 11, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 9

On or about January 16, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

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Count 10

On or about January 27, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 11

On or about March 7 and March 10, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 12

On or about March 13, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 13

On or about March 14, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary

1 Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case
2 Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024..

3 Count 14

4 On or about March 21, 2025, in the County of San Luis Obispo, State of California, the
5 crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was
6 committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by
7 willful disobedience of a process and order lawfully issued by a court, to wit, Temporary

8 Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case
9 Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024..

10 Count 15

11 On or about March 23, 2025, in the County of San Luis Obispo, State of California, the
12 crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was
13 committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by
14 willful disobedience of a process and order lawfully issued by a court, to wit, Temporary

15 Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case
16 Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024..

17 Count 16

18 On or about April 1, 2025, in the County of San Luis Obispo, State of California, the crime
19 of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in
20 that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful
21 disobedience of a process and order lawfully issued by a court, to wit, Temporary

22 Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case
23 Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024..

24 Count 17

25 On or about April 16, 2025, in the County of San Luis Obispo, State of California, the crime
26 of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in
27 that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful
28 disobedience of a process and order lawfully issued by a court, to wit, Temporary

1 Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case
2 Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024..

3 Count 18

4 On or about July 24, 2025, in the County of San Luis Obispo, State of California, the crime
5 of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in
6 that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful

7 disobedience of a process and order lawfully issued by a court, to wit, Temporary

8 Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case
9 Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

10 Count 19

11 On or about August 7, 2025, in the County of San Luis Obispo, State of California, the
12 crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was

13 committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by

14 willful disobedience of a process and order lawfully issued by a court, to wit, Temporary

15 Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case
16 Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

17 Count 20

18 On or about September 29, 2025, in the County of San Luis Obispo, State of California,
19 the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was

20 committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by

21 willful disobedience of a process and order lawfully issued by a court, to wit, Temporary

22 Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case
23 Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

24 Count 21

25 On or about September 30, 2025, in the County of San Luis Obispo, State of California,
26 the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was

27 committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by

28 willful disobedience of a process and order lawfully issued by a court, to wit, Temporary

1 Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case
2 Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

3 Count 22

4 On or about October 5, 2025, in the County of San Luis Obispo, State of California, the
5 crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was

6 committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by
7 willful disobedience of a process and order lawfully issued by a court, to wit, Temporary

8 Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case
9 Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

10 Count 23

11 On or about October 19, 2024, in the County of San Luis Obispo, State of California, the
12 crime of Vandalism Less Than \$400.00 in violation of PC594(b)(2)(A), a Misdemeanor,

13 was committed in that DAVID ALLEN LEADER did maliciously and unlawfully deface,
14 damage and destroy real and personal property which belonged to another, in the amount
15 of less than four hundred dollars (\$400.00).

16 Count 24

17 On or about November 4, 2024, in the County of San Luis Obispo, State of California, the
18 crime of Petty Theft in violation of PC484(a), a Misdemeanor, was committed in that

19 DAVID ALLEN LEADER did unlawfully steal, take, and carry away the personal property of
20 another, to wit, Barry Patrick Fagan.

21 Count 25

22 On or about March 5, 2026, in the County of San Luis Obispo, State of California, the
23 crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was

24 committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by
25 willful disobedience of a process and order lawfully issued by a court, to wit, Temporary

26 Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case
27 Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 26

On or about March 14, 2026, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 27

On or about March 17, 2026, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 28

On or about March 27, 2026, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, Temporary Restraining Order (TRO) - Civil Harassment Prevention - San Luis Obispo County Case Number 24CVP-0403 issued on December 26, 2024 and served on December 30, 2024.

Count 29

On or about November 20, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, a protective court order in CASE NUMBER/25CVP0106, with ISSUE DATE/20250529 and EXPIRATION DATE/20280529.

Count 30

On or about December 15, 2025, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, a protective court order in CASE NUMBER/25CVP0106, with ISSUE DATE/20250529 and EXPIRATION DATE/20280529.

Count 31

On or about March 11, 2026, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, a protective court order in CASE NUMBER/25CVP0106, with ISSUE DATE/20250529 and EXPIRATION DATE/20280529.

Count 32

On or about March 23, 2026, in the County of San Luis Obispo, State of California, the crime of Disobeying Court Order in violation of PC166(a)(4), a Misdemeanor, was committed in that DAVID ALLEN LEADER did unlawfully commit contempt of court by willful disobedience of a process and order lawfully issued by a court, to wit, a protective court order in CASE NUMBER/25CVP0106, with ISSUE DATE/20250529 and EXPIRATION DATE/20280529.

It is further alleged pursuant to Penal Code Section 1170(b)(2) that one or more of the following factors in aggravation listed in California Rule of Court 4.421 may apply to the defendant(s) or to conduct of the defendant(s):

4.421(a)(1) The crime involved great violence, great bodily harm, threat of great bodily harm, and other acts disclosing a high degree of cruelty, viciousness and callousness.

1 4.421(a)(2) The defendant was armed with or used a weapon at the time of the
2 commission of the crime.

3 4.421(a)(3) The victim was particularly vulnerable.

4 4.421(a)(4) The defendant induced others to participate in the commission of the crime
5 and occupied a position of leadership and dominance of other participants in its
6 commission.

7 4.421(a)(5) The defendant induced a minor to commit and assist in the commission of the
8 crime.

9 4.421(a)(6) The defendant threatened witnesses, unlawfully prevented and dissuaded
10 witnesses from testifying, suborned perjury, and in any other way illegally interfered with
11 the judicial process.

12 4.421(a)(7) The defendant is charged with other crimes for which consecutive sentences
13 can be imposed but for which concurrent sentences shall be imposed.

14 4.421(a)(8) The manner in which the crime was carried out indicates planning,
15 sophistication, and professionalism.

16 4.421(a)(9) The crime involved an attempted or actual taking or damage of great monetary
17 value.

18 4.421(a)(10) The crime involved a large quantity of contraband.

19 4.421(a)(11) The defendant took advantage of a position of trust and confidence to commit
20 the offense.

21 4.421(a)(12) The crime constitutes a hate crime under section 422.55 of the Penal Code
22 and no hate crime enhancements under section 422.75 of the Penal Code shall be
23 imposed and the crime is not subject to sentencing under section 1170.8 of the Penal
24 Code.

25 4.421(b)(1) The defendant has engaged in violent conduct that indicates a serious danger
26 to society.

27 4.421(b)(2) The defendant's prior convictions as an adult and sustained petitions in
28 juvenile delinquency proceedings are numerous and of increasing seriousness.

1 4.421(b)(3) The defendant has served a prior term in prison and county jail under section
2 1170(h).

3 4.421(b)(4) The defendant was on probation, mandatory supervision, post release
4 community supervision, and parole when the crime was committed.

5 4.421(b)(5) The defendant's prior performance on probation, mandatory supervision, post
6 release community supervision, and parole was unsatisfactory.

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

3 I declare that an investigation has been conducted to determine if said Defendant(s)
4 did commit the stated crime, which reports are attached hereto and incorporated herein by
5 reference, and that the facts therein show probable cause that the said Defendant(s) did
6 commit the crime. Your declarant requests the issuance of a Warrant of Arrest either if
7 said Defendant(s) do not appear voluntarily in response to an appearance letter, or if no
8 appearance letter was issued.

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

12 On this day July 15, 2026, in the County of San Luis Obispo, I certify and declare
13 under penalty of perjury that the foregoing is true and correct.

14 Dated: July 15, 2026

15 DAN DOW
16 DISTRICT ATTORNEY

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18 
19 By: _____
20 JERRY N. LULEJIAN
21 DEPUTY DISTRICT ATTORNEY

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

24 Dated: _____
25 _____
26 Judge of the Superior Court
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SUMMARY PAGE					
Cnt	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC594(b)(1)	16-2-3	David Allen Leader		
2	PC166(a)(4)	Check Code	David Allen Leader		
3	PC166(a)(4)	Check Code	David Allen Leader		
4	PC166(a)(4)	Check Code	David Allen Leader		
5	PC166(a)(4)	Check Code	David Allen Leader		
6	PC166(a)(4)	Check Code	David Allen Leader		
7	PC166(a)(4)	Check Code	David Allen Leader		
8	PC166(a)(4)	Check Code	David Allen Leader		
9	PC166(a)(4)	Check Code	David Allen Leader		
10	PC166(a)(4)	Check Code	David Allen Leader		
11	PC166(a)(4)	Check Code	David Allen Leader		
12	PC166(a)(4)	Check Code	David Allen Leader		
13	PC166(a)(4)	Check Code	David Allen Leader		
14	PC166(a)(4)	Check Code	David Allen Leader		
15	PC166(a)(4)	Check Code	David Allen Leader		
16	PC166(a)(4)	Check Code	David Allen Leader		
17	PC166(a)(4)	Check Code	David Allen Leader		
18	PC166(a)(4)	Check Code	David Allen Leader		
19	PC166(a)(4)	Check Code	David Allen Leader		
20	PC166(a)(4)	Check Code	David Allen Leader		
21	PC166(a)(4)	Check Code	David Allen Leader		
22	PC166(a)(4)	Check Code	David Allen Leader		
23	PC594(b)(2)(A)	1 Yr. +\$1,000	David Allen Leader		
24	PC484(a)	6 Mo.	David Allen Leader		
25	PC166(a)(4)	Check Code	David Allen Leader		
26	PC166(a)(4)	Check Code	David Allen Leader		
27	PC166(a)(4)	Check Code	David Allen Leader		
28	PC166(a)(4)	Check Code	David Allen Leader		
29	PC166(a)(4)	Check Code	David Allen Leader		
30	PC166(a)(4)	Check Code	David Allen Leader		
31	PC166(a)(4)	Check Code	David Allen Leader		
32	PC166(a)(4)	Check Code	David Allen Leader		