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DAN DOW 1 SAN LUIS OBISPO SUPERIOR COURT BY / CM/L/M/Z DISTRICT ATTORNEY STATE BAR # 237986 2 Tania Chavez, Deputy Clerk COUNTY OF SAN LUIS OBISPO COURTHOUSE ANNEX, 4TH FLOOR 3 DV Case SAN LUIS OBISPO, CA 93408 **BOOKING REQ** TELEPHONE: (805) 781-5800 4 5 6 7 SUPERIOR COURT OF CALIFORNIA 8 COUNTY OF SAN LUIS OBISPO 9 10 COURT CASE NO. 25F-60877 THE PEOPLE OF THE STATE OF CALIFORNIA 11 COMPLAINT Plaintiff, 12 13 VS. DA CASE NO. 079-706484 14 LAURIE LEE BRYANT DOB: 10/22/1962 ID NO. D000022652 15 CII: A31617666 16 17 18 Defendant. Appearance Date: 19 20 The District Attorney of San Luis Obispo County, California, hereby accuses the above-named defendant of the following criminal offenses: 21 22 Count 1 23 On or about August 16, 2024, in the County of San Luis Obispo, State of California, the 24 crime of Cruelty To An Animal in violation of Penal Code Section 597(b), a Felony, was 25 committed in that LAURIE LEE BRYANT did unlawfully torture, torment, deprive of 26 necessary sustenance, drink, or shelter, or cruelly kill an animal, or cause an animal to be 27 so, tortured, tormented, deprived of necessary sustenance, drink, shelter, or to be 28 PAGE - 1 -

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mutilated, or cruelly killed; and who, having the charge or custody of an animal, either as owner or otherwise, subject an animal to needless suffering, or inflict unnecessary cruelty upon the animal, or in any manner abuse an animal, or fail to provide the animal with proper food, drink, or shelter, or protection from the weather.

## Count 2

On or about August 16, 2024, in the County of San Luis Obispo, State of California, the crime of Cruelty To An Animal in violation of Penal Code Section 597(b), a Felony, was committed in that LAURIE LEE BRYANT did unlawfully torture, torment, deprive of necessary sustenance, drink, or shelter, or cruelly kill an animal, or cause an animal to be so, tortured, tormented, deprived of necessary sustenance, drink, shelter, or to be mutilated, or cruelly killed; and who, having the charge or custody of an animal, either as owner or otherwise, subject an animal to needless suffering, or inflict unnecessary cruelty upon the animal, or in any manner abuse an animal, or fail to provide the animal with proper food, drink, or shelter, or protection from the weather.

### Count 3

On or about August 16, 2024, in the County of San Luis Obispo, State of California, the crime of Cruelty To An Animal in violation of Penal Code Section 597(b), a Felony, was committed in that LAURIE LEE BRYANT did unlawfully torture, torment, deprive of necessary sustenance, drink, or shelter, or cruelly kill an animal, or cause an animal to be so, tortured, tormented, deprived of necessary sustenance, drink, shelter, or to be mutilated, or cruelly killed; and who, having the charge or custody of an animal, either as owner or otherwise, subject an animal to needless suffering, or inflict unnecessary cruelty upon the animal, or in any manner abuse an animal, or fail to provide the animal with proper food, drink, or shelter, or protection from the weather.

### Count 4

On or about August 16, 2024, in the County of San Luis Obispo, State of California, the crime of Cruelty To An Animal in violation of Penal Code Section 597(b), a Felony, was

committed in that LAURIE LEE BRYANT did unlawfully torture, torment, deprive of necessary sustenance, drink, or shelter, or cruelly kill an animal, or cause an animal to be so, tortured, tormented, deprived of necessary sustenance, drink, shelter, or to be mutilated, or cruelly killed; and who, having the charge or custody of an animal, either as owner or otherwise, subject an animal to needless suffering, or inflict unnecessary cruelty upon the animal, or in any manner abuse an animal, or fail to provide the animal with proper food, drink, or shelter, or protection from the weather.

#### Count 5

On or about August 16, 2024, in the County of San Luis Obispo, State of California, the crime of Cruelty To An Animal in violation of Penal Code Section 597(b), a Felony, was committed in that LAURIE LEE BRYANT did unlawfully torture, torment, deprive of necessary sustenance, drink, or shelter, or cruelly kill an animal, or cause an animal to be so, tortured, tormented, deprived of necessary sustenance, drink, shelter, or to be mutilated, or cruelly killed; and who, having the charge or custody of an animal, either as owner or otherwise, subject an animal to needless suffering, or inflict unnecessary cruelty upon the animal, or in any manner abuse an animal, or fail to provide the animal with proper food, drink, or shelter, or protection from the weather.

## Count 6

On or about August 16, 2024, in the County of San Luis Obispo, State of California, the crime of Cruelty To An Animal in violation of Penal Code Section 597(b), a Felony, was committed in that LAURIE LEE BRYANT did unlawfully torture, torment, deprive of necessary sustenance, drink, or shelter, or cruelly kill an animal, or cause an animal to be so, tortured, tormented, deprived of necessary sustenance, drink, shelter, or to be mutilated, or cruelly killed; and who, having the charge or custody of an animal, either as owner or otherwise, subject an animal to needless suffering, or inflict unnecessary cruelty upon the animal, or in any manner abuse an animal, or fail to provide the animal with proper food, drink, or shelter, or protection from the weather.

## Count 7

On or about August 16, 2024, in the County of San Luis Obispo, State of California, the crime of Cruelty To An Animal in violation of Penal Code Section 597(b), a Felony, was committed in that LAURIE LEE BRYANT did unlawfully torture, torment, deprive of necessary sustenance, drink, or shelter, or cruelly kill an animal, or cause an animal to be so, tortured, tormented, deprived of necessary sustenance, drink, shelter, or to be mutilated, or cruelly killed; and who, having the charge or custody of an animal, either as owner or otherwise, subject an animal to needless suffering, or inflict unnecessary cruelty upon the animal, or in any manner abuse an animal, or fail to provide the animal with proper food, drink, or shelter, or protection from the weather.

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.
- 4.421(a)(3) The victim was particularly vulnerable.
- 4.421(a)(7) The defendant is charged with other crimes for which consecutive sentences can be imposed but for which concurrent sentences shall be imposed.
- 4.421(a)(8) The manner in which the crime was carried out indicates planning, sophistication, and professionalism.
- 4.421(a)(11) The defendant took advantage of a position of trust and confidence to commit the offense.
- 4.421(b)(2) The defendant's prior convictions as an adult and sustained petitions in juvenile delinquency proceedings are numerous and of increasing seriousness.
- 4.421(b)(5) The defendant's prior performance on probation, mandatory supervision, post release community supervision, and parole was unsatisfactory.

Cnt	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC597(b)		Laurie Lee Bryant		
2	PC597(b)		Laurie Lee Bryant		
3	PC597(b)		Laurie Lee Bryant		
4	PC597(b)		Laurie Lee Bryant		
5	PC597(b)		Laurie Lee Bryant		<b>†</b>
6	PC597(b)	<u> </u>	Laurie Lee Bryant		<del>                                     </del>
7	PC597(b)		Laurie Lee Bryant		<del> </del>

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