

1 DAN DOW
2 DISTRICT ATTORNEY
3 STATE BAR # 237986
4 COUNTY OF SAN LUIS OBISPO
5 COURTHOUSE ANNEX, 4TH FLOOR
6 SAN LUIS OBISPO, CA 93408
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DV Case
 BOOKING REQ

8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF SAN LUIS OBISPO

10
11 THE PEOPLE OF THE STATE OF CALIFORNIA

COURT CASE NO. 26M-04721

12 Plaintiff,

COMPLAINT

13 vs.

14 **KYLE L COMBS**
15 DOB: 11/26/1985
16 ID NO. D000475726
17 CII:

DA CASE NO. 079-726988

18 Defendant.

Appearance Date:

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

22 Count 1

23 On or about December 29, 2025, in the County of San Luis Obispo, State of California, the
24 crime of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a
25 Misdemeanor, was committed in that KYLE L COMBS did willfully and unlawfully, look
26 through a hole and opening, into, and otherwise view by means of any instrumentality,
27 including but not limited to a periscope, telescope, binoculars, camera, motion picture
28 camera, camcorder and mobile phone, the interior of a bedroom, bathroom, changing room,

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COMPLAINT

DA CASE NO. 079-726988

1 fitting room, dressing room and tanning booth and the interior of any other area in which the
2 occupant has a reasonable expectation of privacy, with the intent to invade the privacy of a
3 person and persons inside, Jane Doe 1.

4 Count 2

5 On or about December 19, 2025, in the County of San Luis Obispo, State of California, the
6 crime of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a
7 Misdemeanor, was committed in that KYLE L COMBS did willfully and unlawfully, look
8 through a hole and opening, into, and otherwise view by means of any instrumentality,
9 including but not limited to a periscope, telescope, binoculars, camera, motion picture
10 camera, camcorder and mobile phone, the interior of a bedroom, bathroom, changing room,
11 fitting room, dressing room and tanning booth and the interior of any other area in which the
12 occupant has a reasonable expectation of privacy, with the intent to invade the privacy of a
13 person and persons inside, Jane Doe 2.

14 Count 3

15 On or about December 18, 2025, in the County of San Luis Obispo, State of California, the
16 crime of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a
17 Misdemeanor, was committed in that KYLE L COMBS did willfully and unlawfully, look
18 through a hole and opening, into, and otherwise view by means of any instrumentality,
19 including but not limited to a periscope, telescope, binoculars, camera, motion picture
20 camera, camcorder and mobile phone, the interior of a bedroom, bathroom, changing room,
21 fitting room, dressing room and tanning booth and the interior of any other area in which the
22 occupant has a reasonable expectation of privacy, with the intent to invade the privacy of a
23 person and persons inside, Jane Doe 3.

24 Count 4

25 On or about December 16, 2025, in the County of San Luis Obispo, State of California, the
26 crime of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a
27 Misdemeanor, was committed in that KYLE L COMBS did willfully and unlawfully, look

1 through a hole and opening, into, and otherwise view by means of any instrumentality,
2 including but not limited to a periscope, telescope, binoculars, camera, motion picture
3 camera, camcorder and mobile phone, the interior of a bedroom, bathroom, changing room,
4 fitting room, dressing room and tanning booth and the interior of any other area in which the
5 occupant has a reasonable expectation of privacy, with the intent to invade the privacy of a
6 person and persons inside, Jane Doe 4.

7 Count 5

8 On or about November 20, 2025, in the County of San Luis Obispo, State of California, the
9 crime of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a
10 Misdemeanor, was committed in that KYLE L COMBS did willfully and unlawfully, look
11 through a hole and opening, into, and otherwise view by means of any instrumentality,
12 including but not limited to a periscope, telescope, binoculars, camera, motion picture
13 camera, camcorder and mobile phone, the interior of a bedroom, bathroom, changing room,
14 fitting room, dressing room and tanning booth and the interior of any other area in which the
15 occupant has a reasonable expectation of privacy, with the intent to invade the privacy of a
16 person and persons inside, Jane Doe 5.

17 Count 6

18 On or about November 15, 2025, in the County of San Luis Obispo, State of California, the
19 crime of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a
20 Misdemeanor, was committed in that KYLE L COMBS did willfully and unlawfully, look
21 through a hole and opening, into, and otherwise view by means of any instrumentality,
22 including but not limited to a periscope, telescope, binoculars, camera, motion picture
23 camera, camcorder and mobile phone, the interior of a bedroom, bathroom, changing room,
24 fitting room, dressing room and tanning booth and the interior of any other area in which the
25 occupant has a reasonable expectation of privacy, with the intent to invade the privacy of a
26 person and persons inside, Jane Doe 6.

1 Count 7

2 On or about September 4, 2025, in the County of San Luis Obispo, State of California, the
3 crime of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a
4 Misdemeanor, was committed in that KYLE L COMBS did willfully and unlawfully, look
5 through a hole and opening, into, and otherwise view by means of any instrumentality,
6 including but not limited to a periscope, telescope, binoculars, camera, motion picture
7 camera, camcorder and mobile phone, the interior of a bedroom, bathroom, changing room,
8 fitting room, dressing room and tanning booth and the interior of any other area in which the
9 occupant has a reasonable expectation of privacy, with the intent to invade the privacy of a
10 person and persons inside, Jane Doe 7.

11 Count 8

12 On or about September 4, 2025, in the County of San Luis Obispo, State of California, the
13 crime of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a
14 Misdemeanor, was committed in that KYLE L COMBS did willfully and unlawfully, look
15 through a hole and opening, into, and otherwise view by means of any instrumentality,
16 including but not limited to a periscope, telescope, binoculars, camera, motion picture
17 camera, camcorder and mobile phone, the interior of a bedroom, bathroom, changing room,
18 fitting room, dressing room and tanning booth and the interior of any other area in which the
19 occupant has a reasonable expectation of privacy, with the intent to invade the privacy of a
20 person and persons inside, Jane Doe 8.

21 Count 9

22 On or about September 2, 2025, in the County of San Luis Obispo, State of California, the
23 crime of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a
24 Misdemeanor, was committed in that KYLE L COMBS did willfully and unlawfully, look
25 through a hole and opening, into, and otherwise view by means of any instrumentality,
26 including but not limited to a periscope, telescope, binoculars, camera, motion picture
27 camera, camcorder and mobile phone, the interior of a bedroom, bathroom, changing room,
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1 fitting room, dressing room and tanning booth and the interior of any other area in which the
2 occupant has a reasonable expectation of privacy, with the intent to invade the privacy of a
3 person and persons inside, Jane Doe 9.

4 Count 10

5 On or about August 6, 2025, in the County of San Luis Obispo, State of California, the crime
6 of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a Misdemeanor,
7 was committed in that KYLE L COMBS did willfully and unlawfully, look through a hole and
8 opening, into, and otherwise view by means of any instrumentality, including but not limited
9 to a periscope, telescope, binoculars, camera, motion picture camera, camcorder and
10 mobile phone, the interior of a bedroom, bathroom, changing room, fitting room, dressing
11 room and tanning booth and the interior of any other area in which the occupant has a
12 reasonable expectation of privacy, with the intent to invade the privacy of a person and
13 persons inside, Jane Doe 10.

14 Count 11

15 On or about August 16, 2025, in the County of San Luis Obispo, State of California, the
16 crime of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a
17 Misdemeanor, was committed in that KYLE L COMBS did willfully and unlawfully, look
18 through a hole and opening, into, and otherwise view by means of any instrumentality,
19 including but not limited to a periscope, telescope, binoculars, camera, motion picture
20 camera, camcorder and mobile phone, the interior of a bedroom, bathroom, changing room,
21 fitting room, dressing room and tanning booth and the interior of any other area in which the
22 occupant has a reasonable expectation of privacy, with the intent to invade the privacy of a
23 person and persons inside, Jane Doe 11.

24 Count 12

25 On or about July 12, 2025, in the County of San Luis Obispo, State of California, the crime
26 of Use Instrumentality To View Area Of Privacy in violation of PC647(J)(1), a Misdemeanor,
27 was committed in that KYLE L COMBS did willfully and unlawfully, look through a hole and
28

1 opening, into, and otherwise view by means of any instrumentality, including but not limited
2 to a periscope, telescope, binoculars, camera, motion picture camera, camcorder and
3 mobile phone, the interior of a bedroom, bathroom, changing room, fitting room, dressing
4 room and tanning booth and the interior of any other area in which the occupant has a
5 reasonable expectation of privacy, with the intent to invade the privacy of a person and
6 persons inside, Jane Doe 12.

7
8 The People hereby give notice of the People's intent to admit evidence of prior sexual acts
9 pursuant to Evidence Code section 1108. These incidents include the prior incident(s)
10 described in the police report, chronological report, and/or tapes already provided, and other
11 alleged incidents of abuse, which will be provided as they are obtained by the prosecution.

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 June 23, 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: June 23, 2026

15 DAN DOW
16 DISTRICT ATTORNEY

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18
19 By: _____
20 LISA B MUSCARI
21 CHIEF 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: _____ Judge of the Superior Court

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SUMMARY PAGE

Count	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC647(J)(1)		Kyle L Combs		
2	PC647(J)(1)		Kyle L Combs		
3	PC647(J)(1)		Kyle L Combs		
4	PC647(J)(1)		Kyle L Combs		
5	PC647(J)(1)		Kyle L Combs		
6	PC647(J)(1)		Kyle L Combs		
7	PC647(J)(1)		Kyle L Combs		
8	PC647(J)(1)		Kyle L Combs		
9	PC647(J)(1)		Kyle L Combs		
10	PC647(J)(1)		Kyle L Combs		
11	PC647(J)(1)		Kyle L Combs		
12	PC647(J)(1)		Kyle L Combs		
13	EC1108		Kyle L Combs		