

1 DAN DOW
DISTRICT ATTORNEY
2 STATE BAR # 237986
COUNTY OF SAN LUIS OBISPO
3 COURTHOUSE ANNEX, 4TH FLOOR
SAN LUIS OBISPO, CA 93408
4 TELEPHONE: (805) 781-5800

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO
DEPARTMENT 8

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11 THE PEOPLE OF THE STATE OF
CALIFORNIA
12 Plaintiff,
13 vs.
14 TYLER DALE ANDREE
DOB: 03/25/1996 ID NO. D000444764
15
16 Defendant.

COURT CASE NO. 21F-00918
AMENDED COMPLAINT

DA CASE NO. 079-661472

Appearance Date: March 24, 2021

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

21

Count 1

22 On or about December 31, 2019, in the County of San Luis Obispo, State of California, the
23 crime of Unlawful Sexual Intercourse in violation of PC261.5(c), a Felony, was committed
24 in that engaged in an act of unlawful sexual intercourse with Jane Doe 1, a minor, not the
25 spouse of the defendant, the minor being more than three years younger than the
26 defendant.

27 NOTICE: Being charged with this criminal offense can result in mandatory pre-conviction
28 HIV/AIDS testing and disclosure of the results to a victim and the Chief Medical Officer of

1 the jail or prison facility where you are incarcerated pursuant to Penal Code Section
2 1524.1 and Health and Safety Code section 121055 following a probable cause hearing
3 resulting in a court order.

4 Count 2

5 On or between December 31, 2019 and April 23, 2020, in the County of San Luis Obispo,
6 State of California, the crime of Contact With Minor For Sexual Offense in violation of
7 PC288.3(a), a Felony, was committed in that TYLER DALE ANDREE did unlawfully
8 contact and communicate with a minor Jane Doe 1, knowing that Jane Doe 1 was a minor,
9 with the intent to commit an offense specified in Penal Code Section 207, 209, 261, 264.1,
10 273a, 286, 288, 288a, 288.2, 289, 311.1, 311.2, 311.4, and 311.11 involving Jane Doe 1.

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

13 Count 3

14 On or between September 1, 2020 and October 15, 2020, in the County of San Luis
15 Obispo, State of California, the crime of Contact With Minor For Sexual Offense in violation
16 of PC288.3(a), a Felony, was committed in that TYLER DALE ANDREE did unlawfully
17 contact and communicate with a minor Jane Doe 2, knowing that Jane Doe 2 was a minor,
18 with the intent to commit an offense specified in Penal Code Section 207, 209, 261, 264.1,
19 273a, 286, 288, 288a, 288.2, 289, 311.1, 311.2, 311.4, and 311.11 involving Jane Doe 2.

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

22 Count 4

23 On or between December 31, 2019 and April 23, 2020, in the County of San Luis Obispo,
24 State of California, the crime of Child Molesting in violation of PC647.6(a)(1), a
25 Misdemeanor, was committed in that TYLER DALE ANDREE did unlawfully annoy and
26 molest a child, Jane Doe 1, under the age of eighteen years.

1 NOTICE is hereby given that adjudication as a ward of the Court for this offense and a
2 disposition to the California Youth Authority will require you to register pursuant to Section
3 290 of the Penal Code. Willful failure to register is a felony.

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

6 Count 5

7 On or between September 1, 2020 and October 15, 2020, in the County of San Luis
8 Obispo, State of California, the crime of Child Molesting in violation of PC647.6(a)(1), a
9 Misdemeanor, was committed in that TYLER DALE ANDREE did unlawfully annoy and
10 molest a child, Jane Doe 2, under the age of eighteen years.

11 NOTICE is hereby given that adjudication as a ward of the Court for this offense and a
12 disposition to the California Youth Authority will require you to register pursuant to Section
13 290 of the Penal Code. Willful failure to register is a felony.

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

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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 March 11, 2021, 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: March 11, 2021

15 DAN DOW
16 DISTRICT ATTORNEY

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19 By:
20 DANIELLE E BAKER
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	PC261.5(c)		Tyler Dale Andree		
2	PC288.3(a)		Tyler Dale Andree		
3	PC288.3(a)		Tyler Dale Andree		
4	PC647.6(a)(1)		Tyler Dale Andree		
5	PC647.6(a)(1)		Tyler Dale Andree		