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ATTORNEYS FOR THE PLAINTIFF

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF MARIN

THE PEOPLE OF THE STATE OF CALIFORNIA,	)	NO. SC184823
	)	
PLAINTIFF,	)	AGENCY CASE NO(S).
	)	AC12000001
v.	)	
	)	
JILL ANN BURNELL,	)	
ALEX BURNELL,	)	1ST AMENDED
	)	COMPLAINT
_____	)	
DEFENDANT(S).	)	

I, THE UNDERSIGNED, SAY, ON INFORMATION AND BELIEF, THAT IN THE COUNTY OF MARIN, STATE OF CALIFORNIA:

COUNT 001: On or about December 18, 2012, to December 27, 2012, the crime of CRUELTY TO AN ANIMAL, in violation of Section 597(b) of the Penal Code, a felony, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, did willfully and unlawfully, having the charge of custody of any animal, to wit: Romantic Star, either as owner or otherwise, subjected the animal to needless suffering, or inflicted unnecessary cruelty upon the animal, or in any manner abused the

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animal, or failed to provide the animal with proper food, drink or shelter or protection from the weather.

COUNT 002: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 001, complainant further complains and says: On or about December 18, 2012, to December 27, 2012, the crime of CRUELTY TO AN ANIMAL, in violation of Section 597(b) of the Penal Code, a felony, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, did willfully and unlawfully, having the charge of custody of any animal, to wit: Pookie, either as owner or otherwise, subjected the animal to needless suffering, or inflicted unnecessary cruelty upon the animal, or in any manner abused the animal, or failed to provide the animal with proper food, drink or shelter or protection from the weather.

COUNT 003: For a further and separate cause of complaint, being a different offense of the same class of crimes and offenses as the charge set forth in Count 002, complainant further complains and says: On or about December 18, 2012, to December 27, 2012, the crime of CRUELTY TO AN ANIMAL, in violation of Section 597(b) of the Penal Code, a felony, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, did willfully and unlawfully, having the charge of custody of any animal, to wit: Radieshen, either as owner or otherwise,

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subjected the animal to needless suffering, or inflicted unnecessary cruelty upon the animal, or in any manner abused the animal, or failed to provide the animal with proper food, drink or shelter or protection from the weather.

COUNT 004: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 003, complainant further complains and says: On or about December 18, 2012, to January 4, 2013, the crime of CRUELTY TO AN ANIMAL, in violation of Section 597(b) of the Penal Code, a felony, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, did willfully and unlawfully, having the charge of custody of any animal, to wit: Blackie, either as owner or otherwise, subjected the animal to needless suffering, or inflicted unnecessary cruelty upon the animal, or in any manner abused the animal, or failed to provide the animal with proper food, drink or shelter or protection from the weather.

COUNT 005: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 004, complainant further complains and says: On or about December 18, 2012, to January 4, 2013, the crime of CRUELTY TO AN ANIMAL, in violation of Section 597(b) of the Penal Code, a felony, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, did

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willfully and unlawfully, having the charge of custody of any animal, to wit: Nutsie, either as owner or otherwise, subjected the animal to needless suffering, or inflicted unnecessary cruelty upon the animal, or in any manner abused the animal, or failed to provide the animal with proper food, drink or shelter or protection from the weather.

NOTICE: Conviction of this offense(s), as to Counts 1, 2, 3, 4, and 5, will require the said defendant(s), JILL ANN BURNELL, to provide specimens and samples pursuant to Penal Code Section 296. Willful refusal to provide the specimens and samples is a crime.

NOTICE: Conviction of this offense(s), as to Counts 1, 2, 3, 4, and 5, will require the said defendant(s), ALEX BURNELL, to provide specimens and samples pursuant to Penal Code Section 296. Willful refusal to provide the specimens and samples is a crime.

COUNT 006: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 005, complainant further complains and says: On or about December 18, 2012, to December 27, 2012, the crime of KEEPING AN ANIMAL WITHOUT PROPER CARE, in violation of Section 597.1(a) of the Penal Code, a misdemeanor, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, was the owner, driver, and keeper of an animal,

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to wit: Romantic Star, who, did willfully and unlawfully permit the same to be in a building, enclosure, lane, street, square, and lot, to wit: parcel # 104.070.04, Petaluma located in unincorporated Marin County. , without proper care and attention.

COUNT 007: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 006, complainant further complains and says: On or about December 18, 2012, to December 27, 2012, the crime of KEEPING AN ANIMAL WITHOUT PROPER CARE, in violation of Section 597.1(a) of the Penal Code, a misdemeanor, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, was the owner, driver, and keeper of an animal, to wit: Pookie, who, did willfully and unlawfully permit the same to be in a building, enclosure, lane, street, square, and lot, to wit: parcel # 104.070.04, Petaluma located in unincorporated Marin County. , without proper care and attention.

COUNT 008: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 007, complainant further complains and says: On or about December 18, 2012, to December 27, 2012, the crime of KEEPING AN ANIMAL WITHOUT PROPER CARE, in violation of Section 597.1(a) of the Penal Code, a misdemeanor, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, was the owner, driver, and keeper of an animal,

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to wit: Radieshen, who, did willfully and unlawfully permit the same to be in a building, enclosure, lane, street, square, and lot, to wit: parcel # 104.070.04, Petaluma located in unincorporated Marin County. , without proper care and attention.

COUNT 009: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 008, complainant further complains and says: On or about December 18, 2012, to January 4, 2013, the crime of KEEPING AN ANIMAL WITHOUT PROPER CARE, in violation of Section 597.1(a) of the Penal Code, a misdemeanor, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, was the owner, driver, and keeper of an animal, to wit: Blackie, who, did willfully and unlawfully permit the same to be in a building, enclosure, lane, street, square, and lot, to wit: parcel # 104.070.04, Petaluma located in unincorporated Marin County. , without proper care and attention.

COUNT 010: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 009, complainant further complains and says: On or about December 18, 2012, to January 4, 2013, the crime of KEEPING AN ANIMAL WITHOUT PROPER CARE, in violation of Section 597.1(a) of the Penal Code, a misdemeanor, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, was the owner, driver, and keeper of an animal,

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to wit: Nutsie, who, did willfully and unlawfully permit the same to be in a building, enclosure, lane, street, square, and lot, to wit: parcel # 104.070.04, Petaluma located in unincorporated Marin County. , without proper care and attention.

COUNT 011: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 010, complainant further complains and says: On or about December 18, 2012, to December 27, 2012, the crime of CRUELTY TO AN ANIMAL, in violation of Section 597(b) of the Penal Code, a misdemeanor, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, did willfully and unlawfully, having the charge of custody of any animal, to wit: Aloha , either as owner or otherwise, subjected the animal to needless suffering, or inflicted unnecessary cruelty upon the animal, or in any manner abused the animal, or failed to provide the animal with proper food, drink or shelter or protection from the weather.

COUNT 012: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 011, complainant further complains and says: On or about December 18, 2012, to December 27, 2012, the crime of CRUELTY TO AN ANIMAL, in violation of Section 597(b) of the Penal Code, a misdemeanor, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, did

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willfully and unlawfully, having the charge of custody of any animal, to wit: Federalist, either as owner or otherwise, subjected the animal to needless suffering, or inflicted unnecessary cruelty upon the animal, or in any manner abused the animal, or failed to provide the animal with proper food, drink or shelter or protection from the weather.

COUNT 013: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 012, complainant further complains and says: On or about December 18, 2012, to December 27, 2012, the crime of CRUELTY TO AN ANIMAL, in violation of Section 597(b) of the Penal Code, a misdemeanor, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, did willfully and unlawfully, having the charge of custody of any animal, to wit: Red Wine, either as owner or otherwise, subjected the animal to needless suffering, or inflicted unnecessary cruelty upon the animal, or in any manner abused the animal, or failed to provide the animal with proper food, drink or shelter or protection from the weather.

IT IS FURTHER ALLEGED, as to Counts 11 and 13, this count is hereby specified to be a misdemeanor offense as to said defendant, JILL ANN BURNELL, pursuant to Penal Code Section 17(b)(4).



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IT IS FURTHER ALLEGED, as to Counts 11 and 13, this count is hereby specified to be a misdemeanor offense as to said defendant, ALEX BURNELL, pursuant to Penal Code Section 17(b)(4).

COUNT 014: For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 013, complainant further complains and says: On or about November 24, 2012, to April 9, 2013, the crime of OPERATING A COMMERCIAL ANIMAL ESTABLISHMENT WITHOUT A PERMIT, in violation of Section 8.04.240 of the Marin County Code, a misdemeanor, was committed by JILL ANN BURNELL AND ALEX BURNELL, who, at the time and place last aforesaid, did willfully and unlawfully operate or maintain a commercial animal establishment without first obtaining a permit.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT EXCEPT AS TO THOSE MATTERS STATED ON THE INFORMATION AND BELIEF AND AS TO THOSE MATTERS I BELIEVE THEM TO BE TRUE.

EXECUTED ON 9/18/2013, AT SAN RAFAEL, CALIFORNIA.

*Lori E Frugoli*

LORI E. FRUGOLI  
DEPUTY DISTRICT ATTORNEY