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SC194874A/B/C

FILED

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ATTORNEYS FOR THE PLAINTIFF

JAMES M. KIM, Court Executive Officer
MARIN COUNTY SUPERIOR COURT
By: M. Hebert, Deputy

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MARIN

THE PEOPLE OF THE STATE OF CALIFORNIA,) NO. SC194874A/B/C
)
PLAINTIFF,) AGENCY CASE NO(S).
) SO15005789
)
v.)
)
MORRISON HAZE LAMPLEY,)
)
SEAN MICHAEL ANGOLD,)
)
LILA SCOTT ALLIGOOD,) 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 October 5, 2015, the crime of MURDER, in violation of Section 187(a) of the Penal Code, a felony, was committed by MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, AND LILA SCOTT ALLIGOOD, who, at the time and place last aforesaid, did willfully, unlawfully, and with malice aforethought murder Steve Carter, a human being.

IT IS FURTHER ALLEGED, as to Count 1, that in the commission or attempted commission of the above offense, the said defendant(s), MORRISON HAZE LAMPLEY, intentionally and personally discharged and personally used a firearm, to wit: a handgun, ~~which proximately caused great bodily injury, as defined in Penal Code Section 12022.7, and death to a person other than an accomplice, to wit: Steve Carter, within the meaning of Penal Code Sections 12022.53(d) and 12022.53(g).~~

IT IS FURTHER ALLEGED, as to Count 1, that in the commission of the murder of Steve Carter, by the said defendant(s), MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, and LILA SCOTT ALLIGOOD, they committed the crime of robbery, in violation of Section 211 of the Penal Code, within the meaning of Penal Code Section 190.2(a)(17)(A).

IT IS FURTHER ALLEGED, as to Count 1, that in the commission of the above offense, the murder of the victim Steve Carter, was committed, by the said defendant(s), MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, and LILA SCOTT ALLIGOOD, and that the said defendant(s) intentionally killed the victim by means of lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

NOTICE: THEORIES OF FIRST DEGREE MURDER: The said defendant(s), MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, and LILA SCOTT ALLIGOOD, are hereby notified that in proving Counts 1 and 9, the People of the State of California intend to proceed under three theories of first degree murder: 1) willful, deliberate, and premeditated murder, 2) lying in wait, and 3) felony murder, the underlying felony being that in the commission of the crime(s) charged, the defendant(s), MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, and LILA SCOTT ALLIGOOD, perpetrated or attempted to perpetrate the crime of second degree robbery, a violation of Penal Code Section 211, within the meaning of Penal Code Section 189.

COUNT 002: For a further and separate cause of complaint, being an offense connected together in its commission with and of the same class of crimes as the charge set forth in Count 001, complainant further complains and says: On or about October 5, 2015, the crime of SECOND DEGREE ROBBERY, in violation of Section 211 of the Penal Code, a felony, was committed by MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, AND LILA SCOTT ALLIGOOD, who, at the time and place last aforesaid, did willfully, unlawfully, and by means of force and fear take personal property from the person, possession, and immediate presence of Steve Carter.

IT IS FURTHER ALLEGED, as to Count 2, that in the commission or attempted commission of the above offense, the said defendant(s), MORRISON HAZE LAMPLEY, intentionally and personally discharged and personally used a firearm, to wit: a handgun, which proximately caused great bodily injury, as defined in Penal Code Section 12022.7, and death to a person other than an accomplice, to wit: Steve Carter, within the meaning of Penal Code Sections 12022.53(d) and 12022.53(g).

IT IS FURTHER ALLEGED, as to Counts 1 and 2, that in the commission and attempted commission of the above offense, a principal in said offense, the said defendant(s), SEAN MICHAEL ANGOLD, was armed with a firearm(s), said arming not being an element of the above offense within the meaning of Penal Code Section 12022(a)(1).

IT IS FURTHER ALLEGED, as to Counts 1 and 2, that in the commission and attempted commission of the above offense, a principal in said offense, the said defendant(s), LILA SCOTT ALLIGOOD, was armed with a firearm(s), said arming not being an element of the above offense within the meaning of Penal Code Section 12022(a)(1).

COUNT 003: 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 002, complainant further complains and

says: On or about October 5, 2015, the crime of CRUELTY TO AN ANIMAL, in violation of Section 597(a) of the Penal Code, a felony, was committed by MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, AND LILA SCOTT ALLIGOOD, who, at the time and place last aforesaid, did unlawfully and maliciously and intentionally maim, wound, torture, and mutilate a living animal, to wit: Doberman Pinscher, which was the property of the said defendant(s) and another.

IT IS FURTHER ALLEGED, as to Count 3, that, in the commission and attempted commission of the above offense, the said defendant(s), MORRISON HAZE LAMPLEY, personally used a firearm(s), to wit: Smith and Wesson, within the meaning of Penal Code Sections 12022.5(a) and 1203.06(a)(1).

IT IS FURTHER ALLEGED, as to Count 3, that in the commission and attempted commission of the above offense, a principal in said offense, the said defendant(s), SEAN MICHAEL ANGOLD, was armed with a firearm(s), said arming not being an element of the above offense within the meaning of Penal Code Section 12022(a)(1).

IT IS FURTHER ALLEGED, as to Count 3, that in the commission and attempted commission of the above offense, a principal in said offense, the said defendant(s), LILA SCOTT ALLIGOOD, was armed with a firearm(s), said arming not being an element of the

above offense within the meaning of Penal Code Section
12022(a)(1).

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 October 5, 2015, the crime of POSSESSION OF A
FIREARM BY A FELON, in violation of Section 29800(a)(1) of the
Penal Code, a felony, was committed by MORRISON HAZE LAMPLEY,
who, at the time and place last aforesaid, did willfully and
unlawfully own and have in said defendant's possession and under
his/her custody and control a certain firearm, to wit: Smith and
Wesson handgun, the said defendant(s) having heretofore been duly
and legally convicted of a felony or felonies, to wit:

PRIOR 1: On May 26, 2015, said defendant violated Section 496d
of the Penal Code and was convicted on July 7, 2015, in the
Superior Court, of the San Diego Judicial District, of the State
of California in court case no. SCD262254.

NOTICE: MANDATORY STATE PRISON INCARCERATION: The said
defendant(s), MORRISON HAZE LAMPLEY, is hereby notified, as to
Count 4, that the above felony offense(s) is not governed by
Penal Code Section 1170(h), and that an executed sentence for the
offense(s) herein charged shall be served in the state prison,
pursuant to Penal Code Sections 1170.1(a) and 1170(f).

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 October 5, 2015, the crime of TAKING A VEHICLE WITHOUT THE OWNER'S CONSENT, in violation of Section 10851(a) of the Vehicle Code, a felony, was committed by MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, AND LILA SCOTT ALLIGOOD, who, at the time and place last aforesaid, did willfully and unlawfully drive and take a certain vehicle, to wit: 2003 Volkswagen Jetta Station Wagon, then and there the personal property of Lokita Carter, without the consent of and with the intent to permanently and temporarily deprive the said owner of title to and possession of said vehicle.

COUNT 006: For a further and separate cause of complaint, being an offense connected together in its commission with and of the same class of crimes as the charge set forth in Count 005, complainant further complains and says: On or about October 5, 2015, the crime of RECEIVING A STOLEN VEHICLE, in violation of Section 496d(a) of the Penal Code, a felony, was committed by MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, AND LILA SCOTT ALLIGOOD, who, at the time and place last aforesaid, did willfully and unlawfully buy, receive, conceal, sell, withhold, and aid in concealing, selling, and withholding a vehicle, as defined by Section 415 of the Vehicle Code, to wit: 2003

Volkswagen Jetta Station Wagon, which had been stolen and obtained by extortion, knowing that said property had been stolen and obtained by extortion.

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 October 5, 2015, the crime of BUYING OR RECEIVING STOLEN PROPERTY, in violation of Section 496(a) of the Penal Code, a misdemeanor, was committed by MORRISON HAZE LAMPLEY, who did willfully and unlawfully buy, receive, conceal, sell, withhold, and aid in concealing, selling, and withholding property of a value not exceeding nine hundred and fifty dollars (\$950.00), to wit: Smith and Wesson handgun, said property having been stolen and obtained in a manner constituting theft and extortion, knowing said property to be so stolen and obtained.

COUNT 008: For a further and separate cause of complaint, being an offense connected together in its commission with and of the same class of crimes as the charge set forth in Count 007, complainant further complains and says: On or about October 5, 2015, the crime of BUYING OR RECEIVING STOLEN PROPERTY, in violation of Section 496(a) of the Penal Code, a misdemeanor, was committed by MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, AND LILA SCOTT ALLIGOOD, who did willfully and unlawfully buy, receive,

conceal, sell, withhold, and aid in concealing, selling, and withholding property of a value not exceeding nine hundred and fifty dollars (\$950.00), to wit: tent, day pack, sleeping bag, passport, airline tickets, camping equipment, including tarp, ~~belonging to Audrey Carey, said property having been stolen and~~ obtained in a manner constituting theft and extortion, knowing said property to be so stolen and obtained.

COUNT 009: For a further and separate cause of complaint, being an offense connected together in its commission with and of the same class of crimes as the charge set forth in Count 008, complainant further complains and says: On or about October 2, 2015, the crime of MURDER, in violation of Section 187(a) of the Penal Code, a felony, was committed by MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, AND LILA SCOTT ALLIGOOD, who, at the time and place last aforesaid, did willfully, unlawfully, and with malice aforethought murder Audrey Carey, a human being.

IT IS FURTHER ALLEGED, as to Counts 1 and 9, that the above offense(s), committed by the said defendant(s), MORRISON HAZE LAMPLEY, is a violent felony, within the meaning of Penal Code Section 667.5(c)(1).

IT IS FURTHER ALLEGED, as to Counts 1 and 9, that the above offense committed by the said defendant(s), MORRISON HAZE

LAMPLEY, is a serious felony, within the meaning of Penal Code Section 1192.7(c)(1).

IT IS FURTHER ALLEGED, as to Counts 1 and 9, that the above ~~offense(s), committed by the said defendant(s), SEAN MICHAEL~~ ANGOLD, is a violent felony, within the meaning of Penal Code Section 667.5(c)(1).

IT IS FURTHER ALLEGED, as to Counts 1 and 9, that the above offense committed by the said defendant(s), SEAN MICHAEL ANGOLD, is a serious felony, within the meaning of Penal Code Section 1192.7(c)(1).

IT IS FURTHER ALLEGED, as to Counts 1 and 9, that the above offense(s), committed by the said defendant(s), LILA SCOTT ALLIGOOD, is a violent felony, within the meaning of Penal Code Section 667.5(c)(1).

IT IS FURTHER ALLEGED, as to Counts 1 and 9, that the above offense committed by the said defendant(s), LILA SCOTT ALLIGOOD, is a serious felony, within the meaning of Penal Code Section 1192.7(c)(1).

IT IS FURTHER ALLEGED, as to Count 9 MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, AND LILA SCOTT ALLIGOOD are charged with a special circumstance pursuant to paragraph (3) of subdivision (a)

of Section 190.2 of the Penal Code, the jurisdiction for the charged murder and for any crimes properly joinable with that murder shall be in any county that has jurisdiction pursuant to subdivision (a) of Penal Code Section 790, within the meaning of Penal Code Section 790(b).

IT IS FURTHER ALLEGED as to Counts 1 and 9, that in the commission of the above offense committed by the said defendant(s), MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, and LILA SCOTT ALLIGOOD, the offenses charged are a special circumstance in that the said defendant(s), in this proceeding, have been convicted of more than one offense of murder in the first or second degree, within the meaning of Penal Code Section 190.2(a)(3).

COUNT 010: For a further and separate cause of complaint, being an offense connected together in its commission with and of the same class of crimes as the charge set forth in Count 009, complainant further complains and says: On or about October 2, 2015, the crime of SECOND DEGREE ROBBERY, in violation of Section 211 of the Penal Code, a felony, was committed by MORRISON HAZE LAMPLEY, SEAN MICHAEL ANGOLD, AND LILA SCOTT ALLIGOOD, who, at the time and place last aforesaid, did willfully, unlawfully, and by means of force and fear take personal property from the person, possession, and immediate presence of Audrey Carey.

IT IS FURTHER ALLEGED, as to Counts 1, 2, 9, and 10, that the above offense(s), committed by the said defendant(s), MORRISON HAZE LAMPLEY, is a violent felony and/or serious felony, within the meaning of Penal Code Sections 1170.12(a), (b), and (c):

NOTICE: Conviction of this offense(s), as to Counts 1, 2, 3, 4, 5, 6, 9, and 10, will require the said defendant(s), MORRISON HAZE LAMPLEY, to provide specimens and samples pursuant to Penal Code Section 296. Willful refusal to provide the specimens and samples is a crime.

NOTICE: MANDATORY STATE PRISON INCARCERATION: The said defendant(s), MORRISON HAZE LAMPLEY, is hereby notified, as to Counts 1, 2, 9, and 10, that the above offense(s) is a violent felony within the meaning of Penal Code Section 667.5(c), and that pursuant to Penal Code Sections 1170(h)(3) and 1170(f), an executed sentence for the offense(s) herein charged against said defendant(s) shall be served in the state prison.

NOTICE: MANDATORY STATE PRISON INCARCERATION: The said defendant(s), MORRISON HAZE LAMPLEY, is hereby notified, as to Counts 1, 2, 9, and 10, that the above offense(s) is a serious felony within the meaning of Penal Code Section 1192.7(c), and that pursuant to Penal Code Sections 1170(h)(3) and 1170(f), an

executed sentence for the offense(s) herein charged against said defendant(s) shall be served in the state prison.

IT IS FURTHER ALLEGED, as to Counts 1, 2, 9, and 10, that ~~the above offense(s), committed by the said defendant(s), SEAN MICHAEL ANGOLD,~~ is a violent felony and/or serious felony, within the meaning of Penal Code Sections 1170.12(a), (b), and (c).

NOTICE: Conviction of this offense(s), as to Counts 1, 2, 5, 6, 9, and 10, will require the said defendant(s), SEAN MICHAEL ANGOLD, to provide specimens and samples pursuant to Penal Code Section 296. Willful refusal to provide the specimens and samples is a crime.

NOTICE: MANDATORY STATE PRISON INCARCERATION: The said defendant(s), SEAN MICHAEL ANGOLD, is hereby notified, as to Counts 1, 2, 9, and 10, that the above offense(s) is a violent felony within the meaning of Penal Code Section 667.5(c), and that pursuant to Penal Code Sections 1170(h)(3) and 1170(f), an executed sentence for the offense(s) herein charged against said defendant(s) shall be served in the state prison.

NOTICE: MANDATORY STATE PRISON INCARCERATION: The said defendant(s), SEAN MICHAEL ANGOLD, is hereby notified, as to Counts 1, 2, 9, and 10, that the above offense(s) is a serious felony within the meaning of Penal Code Section 1192.7(c), and

that pursuant to Penal Code Sections 1170(h)(3) and 1170(f), an executed sentence for the offense(s) herein charged against said defendant(s) shall be served in the state prison.

~~IT IS FURTHER ALLEGED, as to Counts 1, 2, 9, and 10, that~~
the above offense(s), committed by the said defendant(s), LILA SCOTT ALLIGOOD, is a violent felony and/or serious felony, within the meaning of Penal Code Sections 1170.12(a), (b), and (c).

NOTICE: Conviction of this offense(s), as to Counts 1, 2, 5, 6, 9, and 10, will require the said defendant(s), LILA SCOTT ALLIGOOD, to provide specimens and samples pursuant to Penal Code Section 296. Willful refusal to provide the specimens and samples is a crime.

NOTICE: MANDATORY STATE PRISON INCARCERATION: The said defendant(s), LILA SCOTT ALLIGOOD, is hereby notified, as to Counts 1, 2, 9, and 10, that the above offense(s) is a violent felony within the meaning of Penal Code Section 667.5(c), and that pursuant to Penal Code Sections 1170(h)(3) and 1170(f), an executed sentence for the offense(s) herein charged against said defendant(s) shall be served in the state prison.

NOTICE: MANDATORY STATE PRISON INCARCERATION: The said defendant(s), LILA SCOTT ALLIGOOD, is hereby notified, as to Counts 1, 2, 9, and 10, that the above offense(s) is a serious

felony within the meaning of Penal Code Section 1192.7(c), and that pursuant to Penal Code Sections 1170(h)(3) and 1170(f), an executed sentence for the offense(s) herein charged against said defendant(s) shall be served in the state prison.

IT IS FURTHER ALLEGED, as to Counts 2 and 10, that the above offense committed by the said defendant(s), MORRISON HAZE LAMPLEY, is a serious felony, within the meaning of Penal Code Section 1192.7(c)(19).

IT IS FURTHER ALLEGED, as to Counts 2 and 10, that the above offense committed by the said defendant(s), MORRISON HAZE LAMPLEY, is a violent felony within the meaning of Penal Code Section 667.5(c)(9).

IT IS FURTHER ALLEGED, as to Counts 2 and 10, that the above offense committed by the said defendant(s), SEAN MICHAEL ANGOLD, is a serious felony, within the meaning of Penal Code Section 1192.7(c)(19).

IT IS FURTHER ALLEGED, as to Counts 2 and 10, that the above offense committed by the said defendant(s), SEAN MICHAEL ANGOLD, is a violent felony within the meaning of Penal Code Section 667.5(c)(9).

IT IS FURTHER ALLEGED, as to Counts 2 and 10, that the above offense committed by the said defendant(s), LILA SCOTT ALLIGOOD, is a serious felony, within the meaning of Penal Code Section 1192.7(c)(19).

IT IS FURTHER ALLEGED, as to Counts 2 and 10, that the above offense committed by the said defendant(s), LILA SCOTT ALLIGOOD, is a violent felony within the meaning of Penal Code Section 667.5(c)(9).

IT IS FURTHER ALLEGED, as to Count 10, that property taken by burglary, carjacking, robbery, theft, and embezzlement, from Audrey Carey County was received in Marin County, with knowledge that the property had been stolen and embezzled, within the meaning of Penal Code Section 786(a).

IT IS FURTHER ALLEGED, as to Counts 1, 2, 9, and 10, that in the commission or attempted commission of the above offense, the said defendant(s), MORRISON HAZE LAMPLEY, with intent to inflict such injury, personally inflicted great bodily injury upon Steve Carter and Audrey Carey, not an accomplice to the above offense, within the meaning of Penal Code Section 1203.075(a)(1).

IT IS FURTHER ALLEGED, as to Counts 9 and 10, that in the commission or attempted commission of the above offense, the said defendant(s), MORRISON HAZE LAMPLEY, intentionally and personally

MORRISON HAZE LAMPLEY, SEAN MICHAEL
ANGOLD, LILA SCOTT ALLIGOOD

SC194874A/B/C

discharged and personally used a firearm, to wit: a handgun,
which proximately caused great bodily injury, as defined in Penal
Code Section 12022.7, and death to a person other than an
accomplice, to wit: Audrey Carey, within the meaning of Penal
~~Code Sections 12022.53(d) and 12022.53(g).~~

IT IS FURTHER ALLEGED, as to Counts 9 and 10, that in the
commission and attempted commission of the above offense, a
principal in said offense, the said defendant(s), SEAN MICHAEL
ANGOLD and LILA SCOTT ALLIGOOD, was armed with a firearm(s), said
arming not being an element of the above offense within the
meaning of Penal Code Section 12022(a)(1).

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 10/12/2015, AT SAN RAFAEL, CALIFORNIA.



DORI K. AHANA
CHIEF DEPUTY DISTRICT
ATTORNEY