

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA

PEOPLE OF THE STATE OF CALIFORNIA

v.

**RYAN WALTERHOUSE**

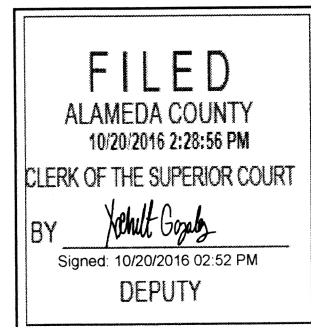
Defendant(s)

NO. 16-CR-011365

COMPLAINT

PFN: BLG021

CEN: 6318699



The undersigned, being sworn says, on information and belief, that RYAN WALTERHOUSE did, in the County of Alameda, State of California, on or about October 13, 2016, commit a FELONY, to wit: CONSPIRACY TO OBSTRUCT JUSTICE, a violation of section 182(a)(5) of the PENAL CODE of California, in that said defendant did unlawfully conspire with another person and persons whose identity is unknown to commit an act injurious to the public health, to public morals, and pervert and obstruct justice, and the due administration of the laws; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant committed the following overt act and acts at and in the County of ALAMEDA:

**OVERT ACT I**

On October 13 2016 Officer Ryan Walterhouse contacted Jane Doe, via phone call and informed her of an undercover Oakland Police Department operation targeting prostitution activities in a specific area of prostitution; and for her to stay away from that area, and for her to "stick to the online thing right now".

**SECOND COUNT**

The undersigned further deposes and says on information and belief, that said RYAN WALTERHOUSE did, in the County of Alameda, State of California, on or about October 14, 2016, commit a FELONY, to wit: CONSPIRACY TO OBSTRUCT JUSTICE, a violation of section 182(a)(5) of the PENAL CODE of California, in that said defendant did unlawfully conspire with another person to commit an act injurious to the public health, to public morals, and pervert and obstruct justice, and the due administration of the laws; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant committed the following overt act and acts at and in the County of ALAMEDA:

**OVERT ACT I**

On October 14th 2016 Officer Ryan Walterhouse contacted Jane Doe, via text message and asked her how she was going to repay him for the information he gave her regarding Oakland Police Department undercover operations targeting prostitution activities.

## OVERT ACT II

On October 14th 2016 Officer Ryan Walterhouse contacted Jane Doe, via text message at 9:58pm and informed her of an Oakland Police Department undercover operation targeting prostitution activities. He informed her "not to be out" and that he would "let her know when to". He further informed her via text message at 10:54pm "not yet", "probably after 12".

## THIRD COUNT

The undersigned further deposes and says on information and belief, that said RYAN WALTERHOUSE did, in the County of Alameda, State of California, on or about October 1, 2016, commit a MISDEMEANOR, to wit: ENGAGING AND AGREEING TO ENGAGE IN PROSTITUTION, a violation of section 647(b) of the PENAL CODE of California, in that said defendant did unlawfully engage in and agree to engage in an act of prostitution and did some act within this state in furtherance of an act of prostitution.

NOTICE: Conviction of this offense will require the court to order an AIDS test pursuant to Penal Code Section 1202.6.

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Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by Penal Code Section 1054.3.

Subscribed and sworn to before me,  
Thursday, October 20, 2016



SABRINA FARRELL  
Deputy District Attorney  
State Bar #215455  
Alameda County, California

This document was filed electronically in  
compliance with Penal Code section 959.1

OPD 16-052562