

F I L E D
Clerk of the Superior Court

SUPERIOR COURT OF CALIFORNIA

APR 19 2007

COUNTY OF SAN DIEGO

By: E. FREEMAN, Deputy

NOTIFY WARRANT ISSUED FOR APPEARANCE ON MAY 1, 2007 @ 8:00 A.M.

mt

THE PEOPLE OF THE STATE OF CALIFORNIA,

No. M014519

Plaintiff.

**AMENDED
COMPLAINT - CRIMINAL**

v.

THOMAS T. STORY,

EG4012

Defendant.

The undersigned, certifying upon information and belief, complains

FIRST COUNT: MC27.3550(b): LOBBYING BY FORMER CITY OFFICIAL

That on or about April 3, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official and for compensation, knowingly counseled or assisted any person other than a Public Agency in connection with an appearance or communication in which the former City Official is prohibited from engaging pursuant to subsection (a) for a one year period immediately following termination of service with the City, in violation of San Diego Municipal Code section 27.3550(b).

SECOND COUNT: MC27.3550(a): LOBBYING BY FORMER CITY OFFICIAL

That on or about April 19 – May 15, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official who had received compensation from the City to work on a particular project during his or her City service, engaged in direct communication with the City, for compensation, with regard to any pending application for discretionary funding or discretionary entitlements before the City relating to that particular project on behalf of any person other than a Public Agency for a one year period immediately following termination of service with the City, in violation of San Diego Municipal Code section 27.3550(a).

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THIRD COUNT: MC27.3550(d): LOBBYING BY FORMER CITY OFFICIAL

That on or about April 19 – May 15, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official engaged in direct communication for the purpose of lobbying the City if all of the following circumstances apply: (1) the former City Official served as a City Official within the previous twelve months; and (2) the former City Official received compensation from the City, for his or her service as a City Official; and (3) the former City Official is receiving compensation from a private business to engage in the direct communication with the City, in violation of San Diego Municipal Code section 27.3550(d).

FOURTH COUNT: MC27.3550(a): LOBBYING BY FORMER CITY OFFICIAL

That on or about June 9, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official who had received compensation from the City to work on a particular project during his or her City service, engaged in direct communication with the City, for compensation, with regard to any pending application for discretionary funding or discretionary entitlements before the City relating to that particular project on behalf of any person other than a Public Agency for a one year period immediately following termination of service with the City, in violation of San Diego Municipal Code section 27.3550(a).

FIFTH COUNT: MC27.3550(a): LOBBYING BY FORMER CITY OFFICIAL

That on or about June 26, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official who had received compensation from the City to work on a particular project during his or her City service, engaged in direct communication with the City, for compensation, with regard to any pending application for discretionary funding or discretionary entitlements before the City relating to that particular project on behalf of any person other than a Public Agency for a one year period immediately following termination of service with the City, in violation of San Diego Municipal Code section 27.3550(a).

SIXTH COUNT: MC27.3550(a): LOBBYING BY FORMER CITY OFFICIAL

That on or about June 28, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official who had received compensation from the City to work on a particular project during his or her City service, engaged in direct communication with the City, for compensation, with regard to any pending application for discretionary funding or discretionary entitlements before the City relating to that particular project on behalf of any person other than a Public Agency for a one year period immediately following termination of service with the City, in violation of San Diego Municipal Code section 27.3550(a).

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SEVENTH COUNT: MC27.3550(a): LOBBYING BY FORMER CITY OFFICIAL

That on or about July 13, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official who had received compensation from the City to work on a particular project during his or her City service, engaged in direct communication with the City, for compensation, with regard to any pending application for discretionary funding or discretionary entitlements before the City relating to that particular project on behalf of any person other than a Public Agency for a one year period immediately following termination of service with the City, in violation of San Diego Municipal Code section 27.3550(a).

EIGHTH COUNT: MC27.3550(d): LOBBYING BY FORMER CITY OFFICIAL

That on or about July 13, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official engaged in direct communication for the purpose of lobbying the City if all of the following circumstances apply: (1) the former City Official served as a City Official within the previous twelve months; and (2) the former City Official received compensation from the City, for his or her service as a City Official; and (3) the former City Official is receiving compensation from a private business to engage in the direct communication with the City, in violation of San Diego Municipal Code section 27.3550(d).

NINTH COUNT: MC27.3550(a): LOBBYING BY FORMER CITY OFFICIAL

That on or about August 2, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official who had received compensation from the City to work on a particular project during his or her City service, engaged in direct communication with the City, for compensation, with regard to any pending application for discretionary funding or discretionary entitlements before the City relating to that particular project on behalf of any person other than a Public Agency for a one year period immediately following termination of service with the City, in violation of San Diego Municipal Code section 27.3550(a).

TENTH COUNT: MC27.3550(d): LOBBYING BY FORMER CITY OFFICIAL

That on or about August 2, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official engaged in direct communication for the purpose of lobbying the City if all of the following circumstances apply: (1) the former City Official served as a City Official within the previous twelve months; and (2) the former City Official received compensation from the City, for his or her service as a City Official; and (3) the former City Official is receiving compensation from a private business to engage in the direct communication with the City, in violation of San Diego Municipal Code section 27.3550(d).

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ELEVENTH COUNT: MC27.3550(a): LOBBYING BY FORMER CITY OFFICIAL

That on or about August 7, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official who had received compensation from the City to work on a particular project during his or her City service, engaged in direct communication with the City, for compensation, with regard to any pending application for discretionary funding or discretionary entitlements before the City relating to that particular project on behalf of any person other than a Public Agency for a one year period immediately following termination of service with the City, in violation of San Diego Municipal Code section 27.3550(a).

TWELFTH COUNT: MC27.3550(a): LOBBYING BY FORMER CITY OFFICIAL

That on or about August 16, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official who had received compensation from the City to work on a particular project during his or her City service, engaged in direct communication with the City, for compensation, with regard to any pending application for discretionary funding or discretionary entitlements before the City relating to that particular project on behalf of any person other than a Public Agency for a one year period immediately following termination of service with the City, in violation of San Diego Municipal Code section 27.3550(a).

THIRTEENTH COUNT: MC27.3550(d): LOBBYING BY FORMER CITY OFFICIAL

That on or about August 16, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official engaged in direct communication for the purpose of lobbying the City if all of the following circumstances apply: (1) the former City Official served as a City Official within the previous twelve months; and (2) the former City Official received compensation from the City, for his or her service as a City Official; and (3) the former City Official is receiving compensation from a private business to engage in the direct communication with the City, in violation of San Diego Municipal Code section 27.3550(d).

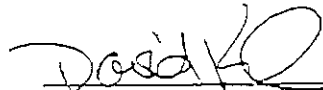
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FOURTEENTH COUNT: MC27.3550(a): LOBBYING BY FORMER CITY OFFICIAL

That on or about October 12, 2006, in the City of San Diego, County of San Diego, State of California, a misdemeanor was committed by defendant, who as a former City Official who had received compensation from the City to work on a particular project during his or her City service, engaged in direct communication with the City, for compensation, with regard to any pending application for discretionary funding or discretionary entitlements before the City relating to that particular project on behalf of any person other than a Public Agency for a one year period immediately following termination of service with the City, in violation of San Diego Municipal Code section 27.3550(a).

Based on information and belief, I declare under penalty of perjury that the foregoing is true and correct.

Dated April 19, 2007, at San Diego, California



David J. Karlin, Deputy City Attorney

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.

AMENDED CRIMINAL COMPLAINT FILED _____