

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
JOSHUA TREE DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)	
)	
Plaintiff)	
)	
vs.)	
)	
Keith Russell Tyerman)	FELONY COMPLAINT
)	
)	
Defendant)	DA CASE NO 2020-00-0052273

The undersigned is informed and believes that:

COUNT 1

On or about November 10, 2020, in the above named judicial district, the crime of ORAL COPULATION OR SEXUAL PENETRATION WITH CHILD 10 YEARS OLD OR YOUNGER, in violation of PENAL CODE SECTION 288.7(b), a felony, was committed by Keith Russell Tyerman, who being a person 18 years of age and older, did engage in oral copulation and sexual penetration, as defined in Penal Code Section 289, with John Doe, a child who was 10 years of age and younger.

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

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

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

COUNT 2

On or about November 10, 2020, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Keith Russell Tyerman, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of John Doe, a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

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

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

COUNT 3

On or about November 10, 2020, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Keith Russell Tyerman, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of John Doe, a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

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

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

COUNT 4

On or about November 10, 2020, in the above named judicial district, the crime of USING MINOR FOR COMMERCIAL SEX ACTS, in violation of PENAL CODE SECTION 311.4(b), a felony, was committed by Keith Russell Tyerman, who did unlawfully and in possession of facts on the basis of which the defendant(s) should reasonably have known that John Doe was a minor

under 18 years, promote, employ, use persuade, induce and coerce the minor to engage in and assist others to engage in: a live performance involving sexual conduct by a minor under the age of 18 years alone and with other persons and animals for commercial purposes.

COUNT 5

On or about November 10, 2020, in the above named judicial district, the crime of POSSESSION OF CHILD OR YOUTH PORNOGRAPHY, in violation of PENAL CODE SECTION 311.11(a), a felony, was committed by Keith Russell Tyerman, who knowingly possessed or controlled matter, the production of which involved the use of a person under 18 years of age, knowing that the matter depicted a person under 18 years of age personally engaging in or simulating sexual conduct.

COUNT 6

On or about October 14, 2020, in the above named judicial district, the crime of EXHIBITING, PUBLISHING MATERIAL DEPICTING CHILD SEXUAL CONTENT, in violation of PENAL CODE SECTION 311.1(a), a felony, was committed by Keith Russell Tyerman, who did unlawfully and knowingly send and cause to be sent, and brought and cause to be brought into this state for sale and distribution, and, in this state, possessed, prepared, published, produced, developed, duplicated and printed a representation of information, data, and image with the intent to distribute and exhibit to, and to exchange with, others, and offered to distribute, distributed, and exhibited to, and exchanged with, others, any obscene matter, knowing that the matter depicted a person under the age of 18 years personally engaging in and personally simulating sexual conduct as defined in Penal Code section 311.4.

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

COUNT 7

On or about October 15, 2020, in the above named judicial district, the crime of EXHIBITING, PUBLISHING MATERIAL DEPICTING CHILD SEXUAL CONTENT, in violation of PENAL CODE SECTION 311.1(a), a felony, was committed by Keith Russell Tyerman, who did

unlawfully and knowingly send and cause to be sent, and brought and cause to be brought into this state for sale and distribution, and, in this state, possessed, prepared, published, produced, developed, duplicated and printed a representation of information, data, and image with the intent to distribute and exhibit to, and to exchange with, others, and offered to distribute, distributed, and exhibited to, and exchanged with, others, any obscene matter, knowing that the matter depicted a person under the age of 18 years personally engaging in and personally simulating sexual conduct as defined in Penal Code section 311.4.

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

* * * * *

NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

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

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 7 COUNT(S).

Executed at Joshua Tree, California, on November 13, 2020.

Michelle Bergey
Michelle Bergey

DECLARANT AND COMPLAINANT

Agency: FBI Riverside

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Keith Russell Tyerman	05/25/1987	2011090048	A38729481	