

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

SECRET

The People of the State of California,
Plaintiff,

v.

1. LINDA FAITH GREENE
aka Lindy Greene
2. KEVIN RICH OLLIFF

CASE NO. BA331988

INDICTMENT

COUNT 1

The said LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of STALKING, in violation of Penal Code Section 646.9(a), a Felony, committed prior to the finding of this Indictment, and as follows:

On or between April 24, 2006 and February 22, 2008, in the County of Los Angeles, the said LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF, did willfully, maliciously, and repeatedly follow and did willfully and maliciously harass Lynn Fairbanks, and made a credible threat with the intent that she be placed in reasonable fear for her safety and the safety of her immediate family.

A TRUE BILL

Foreperson of the Grand Jury

Presented by the Foreperson of the Grand Jury in the presence of the Grand Jury, in open Superior Court of the State of California, within and for the County of Los Angeles, and filed as a record in said Court this 27th day of March, 2009

JOHN A. CLARKE, Executive Officer/Clerk

By _____ Deputy

STEVE COOLEY, District Attorney

By _____ Deputy

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 1 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members.

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 2

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT A CRIME**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between April 24, 2006 and February 22, 2008, in the County of Los Angeles, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF**, did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime **Stalking (Lynn Fairbanks)**, in violation of **Section 646.9(a)** of the **Penal Code**, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. In or about April, 2006, unnamed and/or unidentified co-conspirators listed University of California at Los Angeles (UCLA) Professor Lynn Fairbanks as a “target” on the uclaprimatefreedom.com website, publishing her photograph, date of birth, personal contact information and a statement about her alleged animal experimentation at UCLA.
2. On April 24, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators conducted a demonstration on the campus of UCLA during which time they participated in various statements and chants captured on videotape including, “Vivisection lies and death, free the animals A-L-F.” “...animal rights activists are now the number one domestic terrorists in the United States. We must be doing something fucking right.” and mentioning Professor Lynn Fairbanks by name in various chants.
3. In or about April, 2006, unnamed and/or unidentified co-conspirators, some wearing masks, descended on the Los Angeles home of Professor Lynn Fairbanks during which time the unnamed and/or unidentified co-conspirators shouted through bullhorns and pounded on the front door of her home.
4. On or about June 30, 2006, an unnamed and/or unidentified co-conspirator placed an Improvised Incendiary Device on the front porch of a home two houses to the south of Professor Lynn Fairbanks’ Los Angeles home.
5. On July 11, 2006, Linda Greene as Press Officer for the animalliberationpressoffice.com (NAALPO), and/or other unnamed and/or unidentified co-conspirators, posted an “Anonymous Communique” from the “ALF” listing Professor Lynn Fairbanks’ home address and claiming responsibility for the June 30, 2006 “moletov cocktail” which was left “on her doorstep.”

COUNT 3

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesaid Count hereof, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **THREATENING A PUBLIC OFFICER OR SCHOOL EMPLOYEE**, in violation of **Penal Code Section 71**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between April 24, 2006 and February 22, 2008, in the County of Los Angeles, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF**, did unlawfully and intentionally cause and attempt to cause an officer and employee of a public and private educational institution and any public officer and employee to do, and refrain from doing, an act in the performance of duty, by means of threat directly communicated to a **Public Officer or School Employee (Lynn Fairbanks)**, to inflict an unlawful injury upon the person and property and it reasonably appeared to the recipient of the threat that such threat could be carried out.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 3 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members.

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 4

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesaid Count hereof, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT A CRIME**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between April 24, 2006 and February 22, 2008, in the County of Los Angeles, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF**, did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **THREATENING A PUBLIC OFFICER OR SCHOOL EMPLOYEE (Lynn Fairbanks)**, in violation of **Section 71 of the Penal Code**, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. In or about April, 2006, unnamed and/or unidentified co-conspirators listed University of California at Los Angeles (UCLA) Professor Lynn Fairbanks as a “target” on the uclaprimatfreedom.com website, publishing her photograph, date of birth, personal contact information and a statement about her alleged animal experimentation at UCLA.

2. On April 24, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators conducted a demonstration on the campus of UCLA during which time they participated in various statements and chants captured on videotape including, "Vivisection lies and death, free the animals A-L-F." "...animal rights activists are now the number one domestic terrorists in the United States. We must be doing something fucking right." and mentioning Professor Lynn Fairbanks by name in various chants.
3. In or about April, 2006, unnamed and/or unidentified co-conspirators, some wearing masks, descended on the Los Angeles home of Professor Lynn Fairbanks during which time the unnamed and/or unidentified co-conspirators shouted through bullhorns and pounded on the front door of her home.
4. On or about June 30, 2006, an unnamed and/or unidentified co-conspirator placed an Improvised Incendiary Device on the front porch of a home two houses to the south of Professor Lynn Fairbanks' Los Angeles home.
5. On July 11, 2006, Linda Greene as Press Officer for NAALPO and/or other unnamed and/or unidentified co-conspirators, posted an "Anonymous Communiqué" from the "ALF" listing Professor Lynn Fairbanks' home address and claiming responsibility for the June 30, 2006 "moletov cocktail" which was left "on her doorstep."
6. On July 12, 2006, Linda Greene, as Press Officer for the animalliberationpressoffice.com, and/or other unnamed and/or unidentified co-conspirators, posted a "Press Release" discussing, and quoting in full, the July 11, 2006 "Anonymous Communiqué" from the "ALF" claiming responsibility for the June 30, 2006 Improvised Incendiary Device and urging readers to visit www.uclaprimateliberty.com for more information.
7. On July 15, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators, some utilizing bullhorns, conducted a "home demonstration" at the Los Angeles home of UCLA Professor Lynn Fairbanks during which time they participated in various statements and chants captured on videotape including, "Where were the cops when the ALF hit? Not at your house. We don't believe the FBI bullshit that they got the wrong address." "You cannot stop the A-L-F." "This is the year that you finally got a rough payback but it wasn't nearly enough." and "What goes around comes around, burn the fucker to the ground."
8. In or about July, 2006, unnamed and/or unidentified co-conspirators posted the Multiple Listing Services ("MLS") listing of UCLA Professor Lynn Fairbanks' Los Angeles area home on www.uclaprimateliberty.com.
9. On October 9, 2006, Linda Greene and other unnamed and/or unidentified co-conspirators conducted a demonstration on the campus of UCLA during which time they participated in various statements and chants captured on videotape including, "We conducted a few legal pickets in Lynn Fairbanks' neighborhood too and the twisted little Bi-atch left town. Good! In some of our chants, we asked the monkey killer to leave town. And she obliged us." and "Vivisection lies and death, free the animals A-L-F."
10. On January 19, 2007, Linda Greene and other unnamed and/or unidentified co-conspirators, some wearing bandanas and masks and utilizing bullhorns, conducted a demonstration on the campus of UCLA during which time they displayed a [uclaprimateliberty.com](http://www.uclaprimateliberty.com) banner and participated in various statements and chants captured on videotape including "We...you are being served accountability today for your actions Your apathy. Your abuse. This is the lighter side of accountability. Know that it gets much worse than today. Everyone here today is a law-abiding above ground activist. The entire movement does not operate that way. You do not want to have to face that end of the target. Stop the testing now before it is too late..." "Resign from your positions and demand that UCLA end all animal tests or you will have to hear our voices again and again and again and we are not always this friendly." and "What goes around comes around, burn the fucker to the ground."

11. On February 14, 2007, Linda Greene and other unnamed and/or unidentified co-conspirators, some wearing bandanas and masks and utilizing bullhorns, conducted a demonstration on the campus of UCLA during which time they displayed a uclaprimatfreedom.com banner and participated in various statements and chants captured on videotape including, "...know where you live and if we don't we'll fucking find out you little fucking pussies, you scumbags." "You insist on murdering animals. You are sick and you will be served accountability. This is a very light and fluffy friendly end of accountability. Know that it gets much worse." and "Vivisection lies and death, free the animals A-L-F."

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 4 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime."

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COUNT 5

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **STALKING**, in violation of **Penal Code Section 646.9(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between January 1, 2006 an February 22, 2008, in the County of Los Angeles, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF**, did willfully, maliciously, and repeatedly follow and did willfully and maliciously harass **Dario Ringach**, and made a credible threat with the intent that he be placed in reasonable fear for his safety and the safety of his immediate family.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 5 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime."

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COUNT 6

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT A CRIME**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between January 1, 2006 and February 22, 2008, in the County of Los Angeles, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF**, did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime **Stalking (Dario Ringach)**, in violation of **Section 646.9(a) of the Penal Code**, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. In or about January, 2006, unnamed and/or unidentified co-conspirators listed UCLA Professor Dario Ringach as a "target" on the uclaprimatfreedom.com website, publishing his photograph, personal contact information and a statement about his alleged animal experimentation at UCLA.
2. On or about January 11, 2006, an unnamed and/or unidentified co-conspirator phoned UCLA Professor Dario Ringach at work and told his lab assistant Brian Malone, "you just tell that fucking monkey killer he'd better watch his back when he's leaving the lab because I'm going to fucking kill him."
3. On April 24, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators conducted a demonstration on the campus of UCLA during which time they participated in various statements and chants captured on videotape including, "For the animals we will fight, we know where you sleep at night" and mentioning Professor Dario Ringach by name in various chants.
4. On April 28, 2006, unnamed and/or unidentified co-conspirators, some in bandanas and masks, conducted a "home demonstration" at the Culver City home that UCLA Professor Dario Ringach shared with his wife and two young children during which time they upended trash cans and participated in various statements and chants including, "We know where you live." and "We will never give up."
5. On and between May, 2006 and July, 2006, unidentified co-conspirators sent various e-mails to UCLA Professor Dario Ringach including the statement, "Your time will come."
6. On July 15, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators, some utilizing bullhorns, conducted a "home demonstration" at the Culver City home of UCLA Professor Dario Ringach during which time they participated in various statements and chants captured on videotape including, "Eleven minutes no cops...that's a really long time, you know. What could happen in 11 minutes, Dario?" "We know where you sleep at night" "Your neighbor, Dario Ringach, who lives at 5917 Culview Street is a vicious, sick, perverted, demented, deranged, serial killer of primates at UCLA. Dario gets his rocks off terrorizing monkeys for 120 hours." and "Vivisection lies and death, free the animals, A-L-F."
7. On August 6, 2006, Linda Greene as Press Officer for NAALPO and/or other unnamed and/or unidentified co-conspirators, posted a "Press Release" entitled "'You Win' - UCLA Vivisector Dario Ringach Quits Animal Experimentation" and detailed the acts of animal rights activists against both Professor Ringach and colleague Professor Lynn Fairbanks, including the Improvised Incendiary Device that the A-L-F claimed to have placed at the home of Professor Fairbanks, and twice referencing the uclaprimatfreedom.com website.
8. On October 9, 2006, Linda Greene and other unnamed and/or unidentified co-conspirators conducted a demonstration on the campus of UCLA during which time they participated in various statements and chants captured on videotape including, "Dario Ringach that little coward was a big brave boy in the lab. Torturing defenseless animals. But a few pickets in his neighborhood scared the little wuss off. We can only hope that the rest of you, the rest of you psychos would be scared off so easily." and "Vivisection lies and death, free the animals A-L-F."

9. On January 19, 2007, Linda Greene and other unnamed and/or unidentified co-conspirators, some wearing bandanas and masks and utilizing bullhorns, conducted a demonstration on the campus of UCLA during which time they displayed a uclaprimateliberty.com banner and participated in various statements and chants captured on videotape including, "Your days are numbered." "You are being served a lighthearted accountability today. A minor disruption. It does not always happen like this. Retire now. Follow Dario. It is a quote. 'You win!' That's right, we always win. Retire!" and "Speaking of burning, you are being served the lighter side of accountability today and vivisectors know your addresses are out there. There are aspects of this movement that operate in the dark and do not wait for a police escort."
10. On February 14, 2007, Linda Greene and other unnamed and/or unidentified co-conspirators, some wearing bandanas and masks and utilizing bullhorns, conducted a demonstration on the campus of UCLA during which time they displayed a uclaprimateliberty.com banner and participated in various statements and chants captured on videotape including, "Every move you make. We will find out where you like to spend your free time you murdering fucking perverts and we will be there because we will never back down and we always win." "Today, you are being visited by law-abiding, above ground activists. This is a very friendly visit but know this, not every aspect of this movement operates that way. Not every aspect of this movement waits for the police or comes in the sunlight. Consider yourselves lucky today." and "Your days are numbered and you will be served accountability. As a vivisector. As a...animal abuser. You will be served accountability. This is a friendly visit. It is not always this friendly. Dario was very, very wise. Make that choice. We always win. We won't back down until you stop the killing."

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 6 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime."

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COUNT 7

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **THREATENING A PUBLIC OFFICER OR SCHOOL EMPLOYEE**, in violation of **Penal Code Section 71**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between January 1, 2006 and February 22, 2008, in the County of Los Angeles, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF**, did unlawfully and intentionally cause and attempt to cause an officer and employee of a public and private educational institution and any public officer and employee to do, and refrain from doing, an act in the performance of duty, by means of threat directly communicated to a **Public Officer or School Employee (Dario Ringach)**, to inflict an unlawful injury upon the person and property and it reasonably appeared to the recipient of the threat that such threat could be carried out.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 7 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members.

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 8

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT A CRIME**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between January 1, 2006 and February 22, 2008, in the County of Los Angeles, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF**, did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **THREATENING A PUBLIC OFFICER OR SCHOOL EMPLOYEE (Dario Ringach)**, in violation of **Section 71 of the Penal Code**, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. In or about January, 2006, unnamed and/or unidentified co-conspirators listed UCLA Professor Dario Ringach as a “target” on the uclaprimatfreedom.com website, publishing his photograph, personal contact information and a statement about his alleged animal experimentation at UCLA.
2. On or about January 11, 2006, an unnamed and/or unidentified co-conspirator phoned UCLA Professor Dario Ringach at work and told his lab assistant Brian Malone, “you just tell that fucking monkey killer he’d better watch his back when he’s leaving the lab because I’m going to fucking kill him.”
3. On April 24, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators conducted a demonstration on the campus of UCLA during which time they participated in various statements and chants captured on videotape including, “For the animals we will fight, we know where you sleep at night” and mentioning Professor Dario Ringach by name in various chants.
4. On April 28, 2006, unnamed and/or unidentified co-conspirators, some in bandanas and masks, conducted a “home demonstration” at the Culver City home that UCLA Professor Dario Ringach shared with his wife and two young children during which time they upended trash cans and participated in various statements and chants including, “We know where you live.” and “We will never give up.”
5. On and between May, 2006 and July, 2006, unidentified co-conspirators sent various e-mails to UCLA Professor Dario Ringach including the statement, “Your time will come.”

6. On July 15, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators, some utilizing bullhorns, conducted a "home demonstration" at the Culver City home of UCLA Professor Dario Ringach during which time they participated in various statements and chants captured on videotape including, "Eleven minutes no cops...that's a really long time, you know. What could happen in 11 minutes, Dario?" "We know where you sleep at night" "Your neighbor, Dario Ringach, who lives at 5917 Culview Street is a vicious, sick, perverted, demented, deranged, serial killer of primates at UCLA. Dario gets his rocks off terrorizing monkeys for 120 hours." and "Vivisection lies and death, free the animals, A-L-F."
7. On August 6, 2006, Linda Greene as Press Officer for NAALPO and/or other unnamed and/or unidentified co-conspirators, posted a "Press Release" entitled "'You Win' – UCLA Vivisector Dario Ringach Quits Animal Experimentation" and detailed the acts of animal rights activists against both Professor Ringach and colleague Professor Lynn Fairbanks, including the Improvised Incendiary Device that the A-L-F claimed to have placed at the home of Professor Fairbanks, and twice referencing the uclaprimatefreedom.com website.
8. On October 9, 2006, Linda Greene and other unnamed and/or unidentified co-conspirators conducted a demonstration on the campus of UCLA during which time they participated in various statements and chants captured on videotape including, "Dario Ringach that little coward was a big brave boy in the lab. Torturing defenseless animals. But a few pickets in his neighborhood scared the little wuss off. We can only hope that the rest of you, the rest of you psychos would be scared off so easily." and "Vivisection lies and death, free the animals A-L-F."
9. On January 19, 2007, Linda Greene and other unnamed and/or unidentified co-conspirators, some wearing bandanas and masks and utilizing bullhorns, conducted a demonstration on the campus of UCLA during which time they displayed a uclaprimatefreedom.com banner and participated in various statements and chants captured on videotape including, "Your days are numbered." "You are being served a lighthearted accountability today. A minor disruption. It does not always happen like this. Retire now. Follow Dario. It is a quote. 'You win!' That's right, we always win. Retire!" and "Speaking of burning, you are being served the lighter side of accountability today and vivisectors know your addresses are out there. There are aspects of this movement that operate in the dark and do not wait for a police escort."
10. On February 14, 2007, Linda Greene and other unnamed and/or unidentified co-conspirators, some wearing bandanas and masks and utilizing bullhorns, conducted a demonstration on the campus of UCLA during which time they displayed a uclaprimatefreedom.com banner and participated in various statements and chants captured on videotape including, "Every move you make. We will find out where you like to spend your free time you murdering fucking perverts and we will be there because we will never back down and we always win." "Today, you are being visited by law-abiding, above ground activists. This is a very friendly visit but know this, not every aspect of this movement operates that way. Not every aspect of this movement waits for the police or comes in the sunlight. Consider yourselves lucky today." and "Your days are numbered and you will be served accountability. As a vivisector. As a... animal abuser. You will be served accountability. This is a friendly visit. It is not always this friendly. Dario was very, very wise. Make that choice. We always win. We won't back down until you stop the killing."

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 8 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members.

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 9

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **STALKING**, in violation of **Penal Code Section 646.9(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between August 4, 2006 and December 15, 2006, in the County of Los Angeles, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF**, did willfully, maliciously, and repeatedly follow and did willfully and maliciously harass **Scott Thewes**, and made a credible threat with the intent that he be placed in reasonable fear for his safety and the safety of his immediate family.

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 9 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members.

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

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COUNT 10

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT A CRIME**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between August 4, 2006 and December 15, 2006, in the County of Los Angeles, the said **LINDA FAITH GREENE aka Lindy Greene and KEVIN RICH OLLIFF**, did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime **Stalking (Scott Thewes)**, in violation of **Section 646.9(a) of the Penal Code**, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On August 4, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators arrived at the POM Wonderful Family Picnic in the Malibu Bluffs Park area of the County of Los Angeles during which time they participated in various bullhorn amplified chants captured on videotape including, "We're here to make your life hell and we will keep returning again and again." "We will not let you live. How many sleepless nights and migraines will you force yourself to go through before we're fucking through with you?" "We will...pull your names off the internet...you'll have to look over your shoulder when you open the door to go home at night." "We never go away and we always win." and "For the animals we will fight, we know where you sleep at night." as well as mentioning Scott Thewes by name in various chants.
2. On August 6 and 7, 2006, unidentified co-conspirators, left messages at the Los Angeles County POM Wonderful offices stating such things as "We know where you live." and "Scott Thewes of Westlake Village, we know where you live and we're gonna hit you like we did the other employees."
3. On August 20, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators, some wearing bandanas and masks and utilizing bullhorns, conducted a "home demonstration" at the Woodland Hills home that POM Wonderful Research Doctor Mark Dreher shared with his wife during which time they participated in various statements and chants captured on videotape including, "You thought you could hide from animal rights activists forever, didn't you? You should know us better than that. We always find out and know where all of the POM Wonderful executives live..." "We have pictures of you, we've got your address, we've got your car license plate and we can do whatever the fuck we want. Don't think you can do anything against us." "Ten minutes, no cops." and "What goes around comes around, burn the fucker to the ground."
4. That same day, on August 20, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators drove from the Woodland Hills home of POM Wonderful Research Doctor Mark Dreher and arrived at the Westlake Village home of POM Wonderful Director of Sales and Food Services Scott Thewes.
5. On August 20, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators, some wearing bandanas and masks and utilizing bullhorns, conducted a "home demonstration" at the Westlake Village Ventura County home that POM Wonderful Director of Sales and Food Services Scott Thewes shared with his wife and eleven and thirteen year old daughters during which time they participated in various statements and chants captured on videotape including, "Vivisection lies and death, free the animals A-L-F." "You can't get any protection from [the cops.] It took twenty minutes for them to come in the first place...What can happen in twenty minutes, Scott?" and "What goes around comes around, burn the fucker to the ground."
6. On August 20, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators, some wearing bandanas and masks and utilizing bullhorns, conducted a "home demonstration" at the Santa Monica home of POM Wonderful Vice President of Communications Fiona Posell, during which time they participated in various statements and chants captured on videotape including, "Vivisection lies and death, free the animal A-L-F." "For the animals we will fight, we know where you sleep at night." and "What goes around comes around, burn the fucker to the ground."
7. On or about the late evening of December 15, 2006, unjoined co-conspirators dressed in black clothing and wearing masks, descended on the home of Scott Thewes during which time the unjoined co-conspirators shouted through bullhorns and created a loud disturbance at the home of Scott Thewes.

6. On July 12, 2006, Linda Greene, as Press Officer for the animalliberationpressoffice.com, and/or other unnamed and/or unidentified co-conspirators, posted a "Press Release" discussing, and quoting in full, the July 11, 2006 "Anonymous Communiqué" from the "ALF" claiming responsibility for the June 30, 2006 Improvised Incendiary Device and urging readers to visit www.uclaprimatefreedom.com for more information.
7. On July 15, 2006, Linda Greene, Kevin Olliff and other unnamed and/or unidentified co-conspirators, some utilizing bullhorns, conducted a "home demonstration" at the Los Angeles home of UCLA Professor Lynn Fairbanks during which time they participated in various statements and chants captured on videotape including, "Where were the cops when the ALF hit? Not at your house. We don't believe the FBI bullshit that they got the wrong address." "You cannot stop the A-L-F." "This is the year that you finally got a rough payback but it wasn't nearly enough." and "What goes around comes around, burn the fucker to the ground."
8. In or about July, 2006, unnamed and/or unidentified co-conspirators posted the Multiple Listing Services ("MLS") listing of UCLA Professor Lynn Fairbanks' Los Angeles area home on www.uclaprimatefreedom.com.
9. On October 9, 2006, Linda Greene and other unnamed and/or unidentified co-conspirators conducted a demonstration on the campus of UCLA during which time they participated in various statements and chants captured on videotape including, "We conducted a few legal pickets in Lynn Fairbanks' neighborhood too and the twisted little Bi-atch left town. Good! In some of our chants, we asked the monkey killer to leave town. And she obliged us." and "Vivisection lies and death, free the animals A-L-F."
10. On January 19, 2007, Linda Greene and other unnamed and/or unidentified co-conspirators, some wearing bandanas and masks and utilizing bullhorns, conducted a demonstration on the campus of UCLA during which time they displayed a uclaprimatefreedom.com banner and participated in various statements and chants captured on videotape including "We...you are being served accountability today for your actions Your apathy. Your abuse. This is the lighter side of accountability. Know that it gets much worse than today. Everyone here today is a law-abiding above ground activist. The entire movement does not operate that way. You do not want to have to face that end of the target. Stop the testing now before it is too late..." "Resign from your positions and demand that UCLA end all animal tests or you will have to hear our voices again and again and again and we are not always this friendly." and "What goes around comes around, burn the fucker to the ground."
11. On February 14, 2007, Linda Greene and other unnamed and/or unidentified co-conspirators, some wearing bandanas and masks and utilizing bullhorns, conducted a demonstration on the campus of UCLA during which time they displayed a uclaprimatefreedom.com banner and participated in various statements and chants captured on videotape including, "...know where you live and if we don't we'll fucking find out you little fucking pussies, you scumbags." "You insist on murdering animals. You are sick and you will be served accountability. This is a very light and fluffy friendly end of accountability. Know that it gets much worse." and "Vivisection lies and death, free the animals A-L-F."

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 2 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime."

* * * * *

It is further alleged pursuant to Penal Code section 186.22(b)(1)(A) as to Count 10 that the above offense was committed for the benefit of, at the direction of, and in association with a criminal street gang with the specific intent to promote, further and assist in criminal conduct by gang members.

“NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 186.30(a). Willfull failure to register is a crime.”

* * * * *

DEFENDANT

1. LINDA FAITH GREENE
aka Lindy Greene

2. KEVIN RICH OLLIFF

BOOKING NO. BAIL RECOM'D BAIL

_____ \$ 450,000 _____

_____ \$ 460,000 _____