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Verified Correct Copy of Original 12/14/2022

FILED
CIRCUIT COURT
TILLAMOOK COUNTY STATE
COURTS
2022 DEC 14 PM 3:03
BY TRIAL COURT ADMINISTRATOR

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF TILLAMOOK

STATE OF OREGON
Plaintiff

vs.

JOHN DAVID BONANDER
DOB: 10-02-74
Defendant

**AMENDED DISTRICT
ATTORNEY'S INFORMATION**

Court No. 22CR59819

COUNT 1

The above-named Defendant is accused by this Information of the crime of **INVASION OF PERSONAL PRIVACY IN THE FIRST DEGREE (ORS 163.701 a Class C Felony) (Crime Category 6)** committed as follows:

The defendant, on or about December 11, 2022, in Tillamook County, Oregon, did unlawfully, knowingly, and without the consent of A.M. make or record a record in visual recording of A.M. while A.M. was in a state of nudity and in a place and circumstances where A.M. had a reasonable expectation of personal privacy;

COUNT 2

The above-named Defendant is accused by this Information of the crime of **INVASION OF PERSONAL PRIVACY IN THE FIRST DEGREE (ORS 163.701 a Class C Felony) (Crime Category 6)** committed as follows:

TILLAMOOK COUNTY DISTRICT ATTORNEY
201 Laurel Avenue Tillamook OREGON 97141
(503) 842-3410 FAX (503) 842-1802

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The defendant, on or about December 11, 2022, in Tillamook County, Oregon, did unlawfully, knowingly and without the consent of J.B. make or record a record in visual recording of J.B. while J.B. was in a state of nudity and in a place and circumstances where J.B. had a reasonable expectation of personal privacy;

COUNT 3

The above-named Defendant is accused by this Information of the crime of **TAMPERING WITH PHYSICAL EVIDENCE (ORS 162.295 a Class A Misdemeanor)** committed as follows:

The defendant, on or about December 11, 2022, in Tillamook County, Oregon, did unlawfully and knowingly destroy, mutilate, alter, conceal or remove physical evidence, to-wit: a video recording, thus impairing its verity or availability, with the intent that it be unavailable, used, introduced or rejected in an official proceeding, which to the knowledge of said defendant, was about to be instituted to-wit: criminal prosecution;

COUNT 4

The above-named Defendant is accused by this Information of the crime of **TAMPERING WITH PHYSICAL EVIDENCE (ORS 162.295 a Class A Misdemeanor)** committed as follows:

The defendant, on or about December 12, 2022, in Tillamook County, Oregon, did unlawfully and knowingly destroy, mutilate, alter, conceal or remove physical evidence, to-wit: a video recording, thus impairing its verity or

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availability, with the intent that it be unavailable, used, introduced or rejected in an official proceeding, which to the knowledge of said defendant, was about to be instituted to-wit: criminal prosecution; contrary to the statutes in such cases made and provided and against the peace and dignity of the State of Oregon.

The state further alleges that each of the above referenced counts was a separate episode and course of conduct from the other counts.

The above referenced offenses were committed by the same person or persons, and (applicable provision(s) are marked):


- they are of the same or similar character.
- they are based on the same act or transaction.
- they are based on two or more acts or transactions connected together or constituting parts of a common scheme or plan.

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STATE OF OREGON)
) ss
Tillamook County)

I, Aubrey M. Olson, having been first duly sworn, say that I am the complainant herein and the foregoing complaint is true as I verily believe.


Aubrey M. Olson
Deputy District Attorney II
OSB #181492
aolson@co.tillamook.or.us

SUBSCRIBED AND SWORN to before me on December 14, 2022 by Aubrey Olson




Christine J. Arthur
Notary Public for Oregon

Defendant: John David Bonander
 in Custody

DOB: 10-02-74

Agency: TCSO

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