

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)	
)	
Plaintiff,)	CASE NO. 9LB03611
)	
vs.)	COMPLAINT
)	
MESA AIRLINES, INC, A NEVADA CORP,)	
D.B.A. AMERICAN EAGLE)	
Defendant.)	
_____)	

COUNT NO. 1

I, the undersigned, complain that upon information and belief, on or about August 14, 2018, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N916FJ), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 88.3 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 2

I, the undersigned, complain that upon information and belief, on or about August 16, 2018, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N946LR), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 89.8 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 3

I, the undersigned, complain that upon information and belief, on or about August 23, 2018, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N947LR), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 91.4 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 4

I, the undersigned, complain that upon information and belief, on or about August 24, 2018, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL # N916FJ), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 91.4 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 5

I, the undersigned, complain that upon information and belief, on or about December 28, 2018, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL # N249LR), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 90.6 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 6

I, the undersigned, complain that upon information and belief, on or about January 1, 2019, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N952LR), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 92.3 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 7

I, the undersigned, complain that upon information and belief, on or about May 4, 2018, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N917F7), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 91.9 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 8

I, the undersigned, complain that upon information and belief, on or about May 8, 2019, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N915FJ), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 92.5 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 9

I, the undersigned, complain that upon information and belief, on or about May 24, 2019, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N916FJ), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 92.5 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 10

I, the undersigned, complain that upon information and belief, on or about June 25, 2019, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N244LR), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 92.4 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 11

I, the undersigned, complain that upon information and belief, on or about June 30, 2019, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N902FJ), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 91.6 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 12

I, the undersigned, complain that upon information and belief, on or about June 30, 2019, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N902FJ), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 87.7 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 13

I, the undersigned, complain that upon information and belief, on or about July 12, 2019, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N912FJ), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 90.1 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 14

I, the undersigned, complain that upon information and belief, on or about July 25, 2019, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N945LR), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 91.3 DECIBELS, with no reasonable basis for belief that the subject

aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 15

I, the undersigned, complain that upon information and belief, on or about July 26, 2019, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N926LR), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 90.9 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

COUNT NO. 16

I, the undersigned, complain that upon information and belief, on or about July 31, 2019, in the City of Long Beach, County of Los Angeles, State of California, a misdemeanor was committed by said defendant(s) who then and there did willfully and unlawfully operate an aircraft; to wit, CRJ900 SERIES (TAIL #N945LR), in excess of the Single Even Noise Exposure Level (SENEL) of 79 decibels specified in Section 16.43.040 of the Long Beach Municipal Code; to wit, 91.2 DECIBELS, with no reasonable basis for belief that the subject aircraft would comply with said SENEL limit, in violation of Section **16.43.100** of the Long Beach Municipal Code.

All of which is contrary to the form, force and effect of the statute in such cases made and provided and against the peace and dignity of the People of the State of California.

Said complainant therefore prays that a warrant be issued for the arrest of the said defendant and that said defendant may be dealt with according to law. A declaration in support of the issuance of an arrest warrant is submitted. This complaint is based on the facts and circumstances in the attached documents incorporated herein by reference.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on AUGUST 14, 2019 ss, at Long Beach, California.

Date of Occurrence: 8/14/2018

O.R. Arraignment: 10/2/2019, Dept. S09

Declarant

MESA AIRLINES, INC, A NEVADA CORP, D.B.A.
AMERICAN EAGLE

BKG #: N/A

ADDRESS: 410 N. 44TH STREET
SUITE 700
PHOENIX, AZ 85008

OPER LIC #: N/A

DOB:

SEX: UNKNOWN

RACE: UNKNOWN

HAIR: UNKNOWN

EYES: UNKNOWN

HEIGHT: UNKNOWN

WEIGHT: UNKNOWN

Filing Deputy City Prosecutor: Randall Fudge

Plaintiff, the People of the State of California, hereby requests discovery/disclosure from the defendant(s) and his or her attorney(s) in this case pursuant to Penal Code Sections 1054.3 and 1054.5.

YOU ARE HEREBY NOTIFIED that if complete disclosure is not made within 15 days of this request, plaintiff will seek - - on or before the next court date, or as soon as practicable thereafter - - a court order enforcing the provisions of Penal Code Section 1054.1, subdivisions (b) and (c). This is an ongoing request for any of the listed items which become known to the defendant(s) and his or her attorney(s) after the date of compliance.

The written statements and reports attached hereto constitute discoverable materials designated in Penal Code Section 1054.1. Any additional material discoverable pursuant to Penal Code Section 1054.1 that becomes known to plaintiff will be provided to the defense.

If, prior to or during trial, as a result of this request plaintiff obtains additional evidence or material subject to disclosure under a previous defense request or court order pursuant to Penal Code Section 1054.1, plaintiff will disclose the existence of that evidence or material within a reasonable time.