

ALABAMA JUDICIAL INFORMATION SYSTEM

* * * IN THE DISTRICT COURT OF MOBILE COUNTY * * *

AGENCY NUMBER: S22-11-0027

WARRANT NUMBER: WR 2022 010208.00

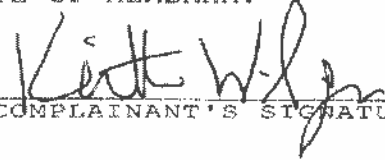
OTHER CASE NBR:

DC 22 10413 GMZ

C O M P L A I N T

BEFORE ME THE UNDERSIGNED JUDGE/CLERK/MAGISTRATE OF THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA, PERSONALLY APPEARED KEITH WILSON WHO BEING DULY SWORN DEPOSES AND SAYS THAT HE/SHE HAS PROBABLE CAUSE FOR BELIEVING, AND DOES BELIEVE THAT PAUL DEANDRE KYLES DEFENDANT, WHOSE NAME IS OTHERWISE UNKNOWN TO THE COMPLAINANT, DID WITHIN THE ABOVE NAMED COUNTY AND

DID ON OR ABOUT 11/2/22, WHILE AT 10491 HUNTERS RIDGE DRIVE, MOBILE, MOBILE,
(X) OWN, POSSESS, KEEP, OR TRAIN ANY DOG WITH THE INTENT THAT SUCH DOG SHALL BE ENGAGED IN AN EXHIBITION OF FIGHTING WITH ANOTHER DOG; IN VIOLATION OF 003-001-029 OF THE CODE OF ALABAMA, AGAINST THE PEACE AND DIGNITY OF THE STATE OF ALABAMA.


COMPLAINANT'S SIGNATURE

SWORN TO AND SUBSCRIBED BEFORE ME THIS THE 09 DAY OF NOVEMBER, 2022.


JUDGE/CLERK/MAGISTRATE OF DISTRICT COURT

CHARGES: DOG FIGHTING

003-001-029

F FELONY

WITNESS FOR THE STATE

KEITH WILSON/MCSO//00000

OPERATOR: SHL

DATE: 11/09/2022

W A R R A N T

STATE OF ALABAMA

MOBILE COUNTY

DISTRICT COURT

AGENCY NUMBER: S22-11-0027

WARRANT NUMBER: WR 2022 010208.00
OTHER CASE NBR:

TO ANY LAWFUL OFFICER OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO ARREST PAUL DEANDRE KYLES AND BRING
HIM/HER BEFORE THE DISTRICT COURT OF MOBILE COUNTY TO ANSWER THE STATE
OF ALABAMA ON A CHARGE(S) OF:DOG FIGHTING CLASS: C TYPE: F COUNTS: 001
AND HAVE YOU THEN AND THERE THIS WRIT WITH YOUR RETURN THEREON.YOU WILL RECEIVE UNTO YOUR CUSTODY AND DETAIN HIM/HER UNTIL THE
DAY OF _____, OR UNTIL LEGALLY DISCHARGED.

DATED THIS 09 DAY OF NOVEMBER, 2022.

BOND SET AT: (1)

BOND TYPE:



JUDGE/CLERK/MAGISTRATE OF DISTRICT COURT

CHARGES: DOG FIGHTING

003-001-029

F FELONY

NAME: PAUL DEANDRE KYLES

ALIAS:

ADDRESS: 10491 HUNTERS RIDGE DR

ALIAS:

ADDRESS:

CITY: MOBILE

STATE: AL

ZIP: 36695 0000

PHONE: 000 000 0000 EXT: 000

EMPLOYMENT:

DOB: 04/28/1975

RACE: B

SEX: M

HAIR: BLK

EYE: BRO HEIGHT: 6'00"

WEIGHT: 235

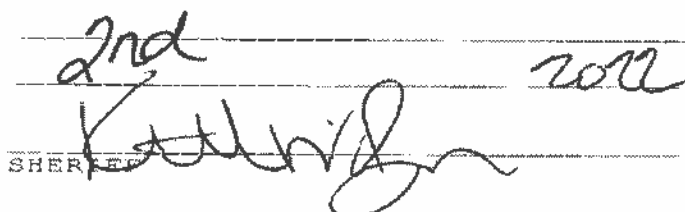
SID: 000000000

SSN: [REDACTED]

DL NUM: 6525088

E X E C U T I O N

EXECUTED THE WITHIN WARRANT BY ARRESTING THE DEFENDANT AND

☒ PLACING DEFENDANT IN THE MOBILE COUNTY JAIL☐ RELEASING DEFENDANT ON APPEARANCE BONDTHIS NOV DAY OF
SHERIFF

BY

COMPLAINANT: KEITH WILSON
MCSO

00000

OPERATOR: SHL

DATE: 11/09/2022

MOBILE COUNTY DISTRICT ATTORNEY'S OFFICE



Ashley M. Rich
District Attorney
State of Alabama

Thirteenth Judicial Circuit

Mailing Address
Post Office Box 2841
Mobile, Alabama 36652-2841
(251) 574-8400

Physical Address
205 Government Street Suite C-701
Mobile, Alabama 36644-2701
fax (251) 574-4848

November 8, 2022

Mobile Metro Jail Docket Room

In Re: S2022110027

Paul Deandre Kyles was arrested by the **Mobile County Sheriff's Department** for probable cause on 11/2/2022 for the offense of **Animal Cruelty 1st**. However, further investigation has shown that insufficient facts exist for the charge of **Animal Cruelty 1st**. Therefore, a warrant may be issued for **DOG FIGHTING**. **The Jurisdiction Will NOT Change.**

Respectfully submitted,

Kirk Rose
Assistant District Attorney

State of Alabama Unified Judicial System Form CR-10 Rev. 8/98	CONSOLIDATED APPEARANCE BOND (District Court, Grand Jury, Circuit Court)	Case Number 522010027																																
IN THE <u>District</u> COURT OF <u>Mobile</u> , ALABAMA <small>(Circuit or District) (Name of County)</small>																																		
<input type="checkbox"/> STATE OF ALABAMA v. <u>Paul DeAndre Kyles</u> <div style="text-align: right;">Defendant</div>																																		
I, <u>PAUL DeAndre Kyles</u> (Defendant), as principal and I (we), <u>METRO BONDING CO.</u> <small>(Please print)</small>																																		
as surety(ies), agree to pay the State of Alabama the sum of \$ <u>3,000</u> and such costs as authorized by law unless the above-named defendant appears before the district court of the county on <u>11-16-22</u> (date) at <u>8:30A</u> M (time) (if date and time are unknown, the words "the scheduled" may be placed in the date blank and a line may be placed in the space for time) and from time to time thereafter until discharged by law or at the next session of circuit court of the county; there to await the action by the grand jury and from session to session thereafter until discharged by law to answer to the charge of <u>DOG CAT Cruelty 1st</u> or any other charge as authorized by law.																																		
We hereby severally certify that we have property valued over and above all debts and liabilities that has a fair market value equal to or greater than the amount of the above bond, and we, and each of us, waive the benefit of all laws exempting property from levy and sale under execution or other process for the collection of debt by the constitution and laws of the State of Alabama, and we especially waive our rights to claim as exempt our wages or salary that we have under the laws of Alabama, and our rights to homestead exemption that we have under the Constitution of Alabama and the laws of the State of Alabama as set out in a separate writing.																																		
It is agreed and understood that this is a consolidated bond, waiving the necessity for multiple bonds and that it shall continue in full force and effect, until the defendant appears before the district court or circuit court, whichever has jurisdiction, to answer the above charge, and from time to time thereafter until the defendant is discharged by law, or, until such time as the undersigned sureties are otherwise duly exonerated as provided by law.																																		
Signed and sealed this date with notice that false statements are punishable as perjury.																																		
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="4">Signature of Defendant <u>Paul Kyles</u> (L.S.)</td> </tr> <tr> <td colspan="2">Address (print) <u>632 Gherig Ave</u></td> <td>City <u>Prichard</u></td> <td>State <u>ALA</u> Zip <u>36610</u></td> </tr> <tr> <td colspan="2">Signature of Surety/Agent of Professional Surety or Bail Company <u>METRO BONDING CO.</u> (L.S.)</td> <td colspan="2">Signature of Surety/Agent of Professional Surety or Bail Company (L.S.)</td> </tr> <tr> <td>Social Security Number</td> <td>Telephone Number <u>251-438-9744</u></td> <td>Social Security Number</td> <td>Telephone Number</td> </tr> <tr> <td>Address (print) <u>150-A Palmetto St.</u></td> <td>City <u>Mobile</u> State <u>AL</u> Zip <u>36603</u></td> <td>Address (print)</td> <td>City State Zip</td> </tr> <tr> <td colspan="2">Signature of Surety/Agent of Professional Surety or Bail Company (L.S.)</td> <td colspan="2">Signature of Surety/Agent of Professional Surety or Bail Company (L.S.)</td> </tr> <tr> <td>Social Security Number</td> <td>Telephone Number</td> <td>Social Security Number</td> <td>Telephone Number</td> </tr> <tr> <td>Address (print)</td> <td>City State Zip</td> <td>Address (print)</td> <td>City State Zip</td> </tr> </table>			Signature of Defendant <u>Paul Kyles</u> (L.S.)				Address (print) <u>632 Gherig Ave</u>		City <u>Prichard</u>	State <u>ALA</u> Zip <u>36610</u>	Signature of Surety/Agent of Professional Surety or Bail Company <u>METRO BONDING CO.</u> (L.S.)		Signature of Surety/Agent of Professional Surety or Bail Company (L.S.)		Social Security Number	Telephone Number <u>251-438-9744</u>	Social Security Number	Telephone Number	Address (print) <u>150-A Palmetto St.</u>	City <u>Mobile</u> State <u>AL</u> Zip <u>36603</u>	Address (print)	City State Zip	Signature of Surety/Agent of Professional Surety or Bail Company (L.S.)		Signature of Surety/Agent of Professional Surety or Bail Company (L.S.)		Social Security Number	Telephone Number	Social Security Number	Telephone Number	Address (print)	City State Zip	Address (print)	City State Zip
Signature of Defendant <u>Paul Kyles</u> (L.S.)																																		
Address (print) <u>632 Gherig Ave</u>		City <u>Prichard</u>	State <u>ALA</u> Zip <u>36610</u>																															
Signature of Surety/Agent of Professional Surety or Bail Company <u>METRO BONDING CO.</u> (L.S.)		Signature of Surety/Agent of Professional Surety or Bail Company (L.S.)																																
Social Security Number	Telephone Number <u>251-438-9744</u>	Social Security Number	Telephone Number																															
Address (print) <u>150-A Palmetto St.</u>	City <u>Mobile</u> State <u>AL</u> Zip <u>36603</u>	Address (print)	City State Zip																															
Signature of Surety/Agent of Professional Surety or Bail Company (L.S.)		Signature of Surety/Agent of Professional Surety or Bail Company (L.S.)																																
Social Security Number	Telephone Number	Social Security Number	Telephone Number																															
Address (print)	City State Zip	Address (print)	City State Zip																															
Date <u>11-2-22</u>		Approved by: <u>Sam Cochran</u> Approved by: <u>PS Dixon</u> <small>Judge/Magistrate/Sheriff</small>																																
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="5">Defendant's Information</th> </tr> <tr> <td>Date of Birth <u>4-28-75</u></td> <td>Sex <u>M</u></td> <td>Height <u>6'0</u></td> <td>Weight <u>225</u></td> <td>Employer</td> </tr> <tr> <td>Social Security Number <u>6228</u></td> <td>Race <u>B</u></td> <td>Hair <u>BLK</u></td> <td>Eyes <u>BRN</u></td> <td>Employer's Address</td> </tr> <tr> <td>Driver's License Number (state)</td> <td>Telephone Number <u>251-382-2966</u></td> <td colspan="3">Employer's Telephone Number</td> </tr> </table>			Defendant's Information					Date of Birth <u>4-28-75</u>	Sex <u>M</u>	Height <u>6'0</u>	Weight <u>225</u>	Employer	Social Security Number <u>6228</u>	Race <u>B</u>	Hair <u>BLK</u>	Eyes <u>BRN</u>	Employer's Address	Driver's License Number (state)	Telephone Number <u>251-382-2966</u>	Employer's Telephone Number														
Defendant's Information																																		
Date of Birth <u>4-28-75</u>	Sex <u>M</u>	Height <u>6'0</u>	Weight <u>225</u>	Employer																														
Social Security Number <u>6228</u>	Race <u>B</u>	Hair <u>BLK</u>	Eyes <u>BRN</u>	Employer's Address																														
Driver's License Number (state)	Telephone Number <u>251-382-2966</u>	Employer's Telephone Number																																
<input type="checkbox"/> Property Bond <input type="checkbox"/> Professional Surety/Bail Company Bond <input type="checkbox"/> Cash Bond																																		

DECLARATION OF PROBABLE CAUSE
MOBILE COUNTY METRO JAIL

Agency Name :	Mobile County Sheriff's Office	Agency ORI Number :	0020000	Agency Case #	s220100027
Arrestee's Name (Last, First, MI) :	Kyles, Paul Deandre	AKA / Alias :			
DOB :	0 4 2 8 1 9	Age:		SSN :	[REDACTED]
				POB :	
Race :	B	Ethnicity:	UNK	Sex :	M
				Height :	6'0
				Weight :	235
				Hair:	BLK
				Eyes:	BRO
DL# :		State :		Phone:	
				Occupation :	
Home Address :	10841 Hunters Ridge Dr	City :		Mobile	
				State:	AL
				Zip:	36695
Employer Name:		Address :		Work Phone :	
Arrest Date :	11/2/2022	Time :	1000	Arrest Location :	10841 Hunters Ridge Dr
Codefendants :					

[illegible]

Arresting Officer's Name (last, first)	Employee ID #	Transporting Officer's Name (last, first)	Employee ID #
Kieth Wilson	18417	Alex Olivier	18417

OFFICER'S INPUT TO THE DISTRICT ATTORNEY'S OFFICE AND TO THE JUDGES

- ☒ This charge is very serious. The victim and all witnesses (including myself and other officers) will appear in court to prosecute this case to the fullest extent possible.

- ☐ I recommend that the bond be set at ☐ \$ ☐ NO BOND. because : (tell it all)

- ☐ Prior FELONY conviction(s) :

- ☐ Other :

Officer's Arrest Narrative

Facts and circumstances which support the probable cause arrest

~~The subject stabbed his brother Brian in the arm with a knife causing serious physical injury.~~

Listed Charges

Officer's Signature V.G

Case Review

INTAKE NUMBER: 22009545

Personally appeared before me KEITH WILSON

SUSPECT INFORMATION

NAME: MR. PAUL DEANDRE KYLES ALIAS:

RACE: BLACK SEX: MALE EYE: BROWN HAIR: BLACK

DOB: 04-28-1975 METRO ID: 43324

HEIGHT: 6

WEIGHT: 225

SS#: [REDACTED]

ADDRESS: 10491 Hunters Ridge Dr.
Mobile, AL 36695

VICTIM

NAME:

ADDRESS: State of Alabama
205 Government St.
Mobile, AL 36644

PHONE: 251-574-8000

OFFICER IN CHARGE OF CASE

NAME: KEITH WILSON

AGENCY: MOBILE COUNTY SHERIFF'S OFFICE

ADDRESS: P.O. BOX 113
Mobile, AL 36601

AGENCY ORI:

OTHER

JAIL STATUS:

OFFENSE CODE: 62010200 - DOG FIGHTG

OFFENSE INFORMATION

OFFENSE: DOG FIGHTG

STATUTE: 3-1-29

DRUGS:

OFFICER CASE NO: S2022110027

MISDEMEANORS:

INCIDENT DATE: 11/2/2022

INCIDENT LOCATION: 10491 Hunters Ridge Dr.

Mobile AL 36695

PRIOR CONVICTIONS

PRIORS:

WITNESSES

DC Sub <input type="checkbox"/>	CC Sub <input type="checkbox"/>	NAME: ROLE: Victim	ADDRESS: State of Alabama 205 Government St. Mobile, AL 36644
DC Sub <input checked="" type="checkbox"/>	CC Sub <input type="checkbox"/>	NAME: Wilson, Keith ROLE: Officer In Charge	ADDRESS: Mobile County Sheriff's Office P.O. BOX 113 Mobile, AL 36601



ELECTRONICALLY FILED
11/14/2022 12:06 PM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
JOJO SCHWARZAUER, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA
CRIMINAL DIVISION

STATE OF ALABAMA,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO.: DC-2022-010413.00
)	
PAUL DEANDRE KYLES,)	
)	
Defendant.)	

NOTICE OF APPEARANCE

Please note the appearance of WILLIE J. HUNTLEY, JR., as attorney of record for the Defendant, PAUL DEANDRE KYLES.

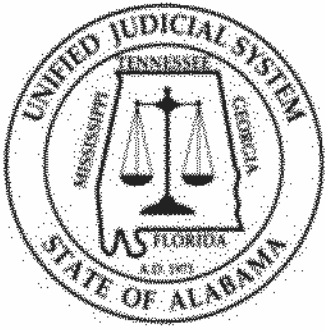
/s/ Willie J. Huntley, Jr.
Attorney for Defendant
Willie J. Huntley, Jr. (HUN009)
The Huntley Firm, P.C.
Post Office Box 370
Mobile, Alabama 36601
(251) 434-0007 – Phone
huntfirm@bellsouth.net

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing with the Clerk of the Court using the AlaFile system which will send notification of such filing to the following on the 14th day of November, 2022.

Mobile County District Attorney's Office

s/ Willie J. Huntley, Jr.
Of Counsel



AlaFile E-Notice

02-DC-2022-010413.00

To: WILLIE JULIUS HUNTLEY JR.
huntfirm@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

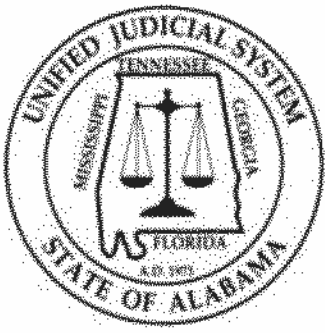
STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following NOTICE OF APPEARANCE was FILED on 11/14/2022 12:06:48 PM

Notice Date: 11/14/2022 12:06:48 PM

JOJO SCHWARZAUER
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
jo.schwarzauer@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

To: KYLES PAUL DEANDRE (PRO SE)
632 GHERIG AVE
PRICHARD, AL, 36610-0000

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

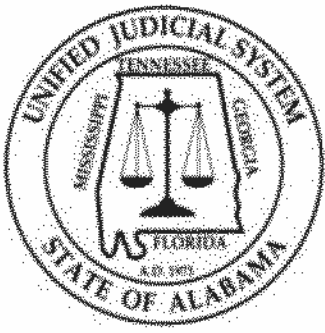
STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following NOTICE OF APPEARANCE was FILED on 11/14/2022 12:06:48 PM

Notice Date: 11/14/2022 12:06:48 PM

JOJO SCHWARZAUER
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
jo.schwarzauer@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

To: BLANCHARD JACQUELINE MARY
jacquelineblanchard@mobileda.org

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following NOTICE OF APPEARANCE was FILED on 11/14/2022 12:06:48 PM

Notice Date: 11/14/2022 12:06:48 PM

JOJO SCHWARZAUER
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
jo.schwarzauer@alacourt.gov

State of Alabama
Unified Judicial System

Form CR-9 Rev. 3/95

PLEA OF NOT GUILTY AND WAIVER
ARRAIGNMENTELECTRONICALLY FILED
11/14/2022 12:12 PM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
JOJO SCHWARZAUER, CLERKIN THE District COURT OF Mobile, ALABAMA
(Circuit, District, or Municipal) (Name of County or Municipality)☒ STATE OF ALABAMA v. Paul Deandre Kyles, Defendant

Comes now, the defendant in the above-styled matter, and to the offense charged enters a plea of

☒
☐
☐Not Guilty
Not Guilty by Reason of Mental Disease or Defect
Not Guilty and Not Guilty by Reason of Mental Disease or Defect

Defendant acknowledges receipt of the copy of the charge against him/her and further waives the right to have an arraignment at which the defendant is present in person, or at which the defendant is represented by an attorney.

But, the defendant specifically and expressly reserves the right upon the filing hereof to hereafter, but before trial or before such date as may be set by the court, to interpose any defenses, objections, or motions which the defendant had the right as a matter of law or rule to interpose in this cause, prior to the filing hereof.

Defendant's date of birth is 4-28-75 Defendant's age is 47

The defendant is not eligible for consideration by the court for youthful offender status as provided by law.

11-4-22
Date
11-4-22
DatePaul Kyles
Defendant
Willie D. Huntley Jr
Attorney for Defendant

This is to certify that I am the attorney for the defendant in this matter, and that I have fully explained this form and all matters set forth herein, and pertaining hereto, to the defendant. I further state to the court that I have explained to the defendant his right to be arraigned in person and his right to have me represent him at arraignment. I further certify to the court that my client hereby knowingly, voluntarily, and intelligently waives these rights after a full and complete explanation of each and every one of them to him/her by me. BOTH MYSELF AND THE DEFENDANT UNDERSTAND THAT I AM RESPONSIBLE FOR ASCERTAINING WHAT DATE, IF ANY, HAS BEEN SET BY THE COURT FOR THE MAKING OR FILING OF ANY DEFENSES, OBJECTIONS, OR MOTIONS. I FURTHER UNDERSTAND THAT I AM RESPONSIBLE FOR NOTIFYING MY CLIENT OF THE DATE HIS/HER CASE IS SET FOR TRIAL, AND THAT I HAVE ADVISED AND INFORMED HIM/HER THAT IN THE EVENT HE/SHE FAILS TO APPEAR ON THE DATE HIS/HER CASE IS SET FOR TRIAL, ALL APPROPRIATE LEGAL ACTION WILL BE TAKEN BY THE COURT AGAINST THE DEFENDANT AND HIS/HER BOND. I further certify to the court that I have advised my client that he/she is responsible for obtaining the date his/her case is set for trial in this matter and that in the event he/she fails to appear on the date his/her case is set for trial all appropriate legal action will be taken by the court against the defendant and his/her bond, and I hereby certify that the defendant knows that he/she is personally responsible for obtaining the date his/her case is set for trial and for being present in court on that date.

11-4-22
DateWillie D. Huntley Jr
Attorney for Defendant Signature

I certify that I served a copy of the foregoing plea and waiver of arraignment on the Prosecutor by mailing/delivering a copy of the same to him/her on:

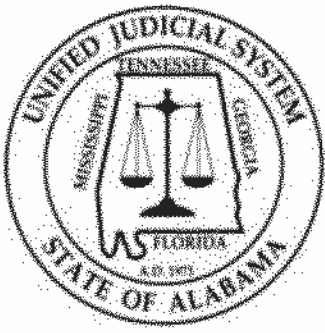
11-4-22
DateWillie D. Huntley Jr
Printed or Typed Attorney's Name
PO Box 370 Mobile, AL 36601
Address

This is to certify that my attorney has explained each and every matter and right set forth in this form and I have completely and fully read and do so understand each and every matter set forth in this form. I further state to the court that I do not wish to be personally present at an arraignment in this case and that I do not want to have an attorney represent me at an arraignment and WITH FULL KNOWLEDGE OF EACH OF THESE RIGHTS, I HEREBY EXPRESSLY WAIVE SUCH RIGHTS. I further state to the court that I have been informed of the charge against me and have received a copy of the charge.

11-4-22
DatePaul Kyles
Defendant Signature

Filed in office this date _____

By _____
Clerk



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: WILLIE JULIUS HUNTLEY JR.
huntfirm@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

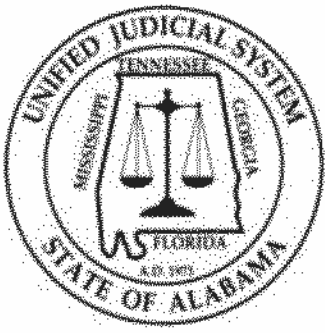
The following matter was FILED on 11/14/2022 12:12:04 PM

D001 KYLES PAUL DEANDRE
MOTION FOR PLEA OF NOT GUILTY AND WAIVER OF ARRAIGNMENT
[Filer: HUNTLEY WILLIE JULIUS JR.]

Notice Date: 11/14/2022 12:12:04 PM

JOJO SCHWARZAUER
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
jo.schwarzauer@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: BLANCHARD JACQUELINE MARY
jacquelineblanchard@mobileda.org

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following matter was FILED on 11/14/2022 12:12:04 PM

D001 KYLES PAUL DEANDRE
MOTION FOR PLEA OF NOT GUILTY AND WAIVER OF ARRAIGNMENT
[Filer: HUNTLEY WILLIE JULIUS JR.]

Notice Date: 11/14/2022 12:12:04 PM

JOJO SCHWARZAUER
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
jo.schwarzauer@alacourt.gov



ELECTRONICALLY FILED
11/14/2022 12:26 PM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
JOJO SCHWARZAUER, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA
CRIMINAL DIVISION

STATE OF ALABAMA,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO.: DC-2022-010413.00
)	
PAUL DEANDRE KYLES,)	
)	
Defendant.)	

DEMAND FOR PRELIMINARY HEARING

Pursuant to Ala. R. Crim. P. 15-11-1, the Defendant respectfully moves the Court for a preliminary hearing for the reasons hereinafter set out.

The Defendant was arrested on November 2, 2022, on the charge of Animal Cruelty 1st Degree. The Defendant has not been indicted on said charges. The Defendant pleads Not Guilty.

The Defendant further shows that at no time has he knowingly, understandably, and intelligently waived his constitutional right to a preliminary hearing on these charges.

The State will not be prejudiced by allowing the Defendant a preliminary hearing. Unless advance agreement is made with the State, the Defendant and his Attorney will be prepared to proceed.

WHEREFORE, Defendant would ask the Court to set the matter for a preliminary hearing.

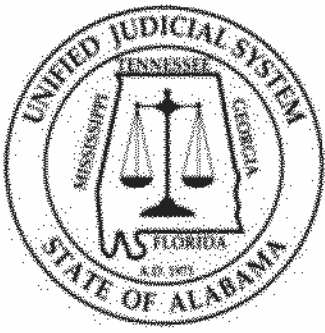
s/ Willie J. Huntley, Jr.
Attorney for Defendant
Willie J. Huntley, Jr. (HUN009)
The Huntley Firm, P.C.
Post Office Box 370
Mobile, Alabama 36601
(251) 434-0007 – Phone
huntfirm@bellsouth.net

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing with the Clerk of the Court using the AlaFile system which will send notification of such filing to the following on the 14th day of November, 2022.

Mobile County District Attorney's Office

s/ Willie J. Huntley, Jr.
Of Counsel



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: WILLIE JULIUS HUNTLEY JR.
huntfirm@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

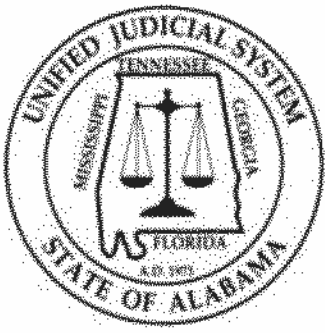
The following matter was FILED on 11/14/2022 12:26:35 PM

D001 KYLES PAUL DEANDRE
MOTION/DEMAND FOR PRELIMINARY HEARING
[Filer: HUNTLEY WILLIE JULIUS JR.]

Notice Date: 11/14/2022 12:26:35 PM

JOJO SCHWARZAUER
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
jo.schwarzauer@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: BLANCHARD JACQUELINE MARY
jacquelineblanchard@mobileda.org

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following matter was FILED on 11/14/2022 12:26:35 PM

D001 KYLES PAUL DEANDRE
MOTION/DEMAND FOR PRELIMINARY HEARING
[Filer: HUNTLEY WILLIE JULIUS JR.]

Notice Date: 11/14/2022 12:26:35 PM

JOJO SCHWARZAUER
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
jo.schwarzauer@alacourt.gov



ELECTRONICALLY FILED
11/15/2022 12:27 PM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
JOJO SCHWARZAUER, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA

)

V.

)

) Case No.: DC-2022-010413.00

)

KYLES PAUL DEANDRE
Defendant.

)

)

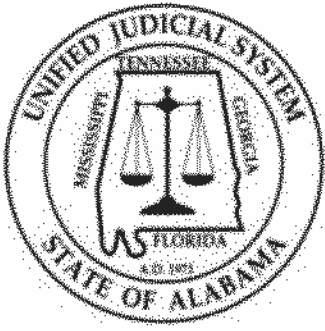
ORDER

MOTION/DEMAND FOR PRELIMINARY HEARING filed by KYLES PAUL DEANDRE is hereby GRANTED. Preliminary hearing is set January 5, 2023 at 8:30 a.m. in courtroom 4300.

DONE this 15th day of November, 2022.

/s/ GEORGE M. ZOGHBY

DISTRICT JUDGE



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: BLANCHARD JACQUELINE MARY
jacquelineblanchard@mobileda.org

NOTICE OF COURT ACTION

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

A court action was entered in the above case on 11/15/2022 12:27:09 PM

ORDER

[Filer:]

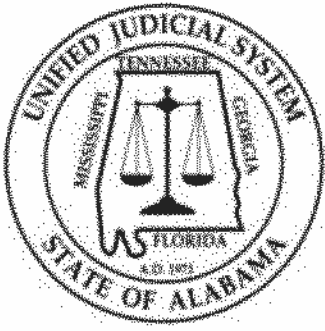
Disposition: GRANTED

Judge: GMZ

Notice Date: 11/15/2022 12:27:09 PM

JOJO SCHWARZAUER
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
jo.schwarzauer@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: HUNTLEY WILLIE JULIUS JR.
huntfirm@bellsouth.net

NOTICE OF COURT ACTION

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

A court action was entered in the above case on 11/15/2022 12:27:09 PM

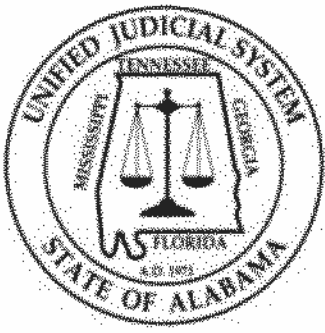
ORDER

[Filer:]

Disposition: GRANTED
Judge: GMZ
Notice Date: 11/15/2022 12:27:09 PM

JOJO SCHWARZAUER
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
jo.schwarzauer@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: KYLES PAUL DEANDRE
632 GHERIG AVE
PRICHARD, AL, 36610-0000

NOTICE OF COURT ACTION

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

A court action was entered in the above case on 11/15/2022 12:27:09 PM

ORDER

[Filer:]

Disposition: GRANTED
Judge: GMZ
Notice Date: 11/15/2022 12:27:09 PM

JOJO SCHWARZAUER
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
jo.schwarzauer@alacourt.gov

THE COURT OF MOBILE COUNTY

11/15/2022

STATE OF ALABAMA VS KYLES PAUL DEANDRE

DC 2022 010413 00

MOBILE GOVERNMENT PLAZA
205 GOVERNMENT STREET
COURTROOM 4300, 4TH FLOOR
MOBILE, AL 36644

DATE: 01052023
TIME: 0830AM

NAME / ADDRESS	REQUESTED BY:	ISSUED:	SERVED:	INIT:
KEITH WILSON MCSO	STATE	11152022		

11152022

00000-0000

NOTE:

TO ANY LAW OFFICER OF THE STATE OF ALABAMA:

YOU ARE HEREBY ORDERED TO SERVE SUBPOENAS ON THE ABOVE NAMED
PERSONS AND MAKE RETURN TO THIS COURT.

ISSUED BY: JOJO SCHWARZAUER
CLERK OF COURT



Mobile County Sheriff's Office

DC 2022 010413.00

STATE OF ALABAMA VS KYLES PAUL DEANDRE

WITNESS SUBPOENA

WILSON, RONALD KEITH

1514 A S Broad St Mobile, AL 36605

Due By: 01/05/2023

Date Served: 11/17/2022

Service Attempt:

Action: ☐ Service Attempt ☒ Paper Served ☐ Drop Deputized

No Contact: ☐ Left Card ☐ Other (see notes)

Not Found: ☐ Moved - New Residence ☐ Moved - Unknown Location ☐ Deceased ☐ Vacant Residence / Lot

☐ Not Employed ☐ NIT (Not in Territory) ☐ RWA (Recalled W/O Action) ☐ CTO (Come to Office)

☐ Other (see notes) ☐ No Property Found ☐ Address Does Not Exist

☐ Subject Unknown at this Address ☐ Not Found After Diligent Search

☐ Not Found-Too Late For Service ☐ Not Found-Deputy Not Allowed on Property

☐ Recipient Unavailable for Service Before Due Date

Served To: WILSON, RONALD KEITH

Location Served: ☒ Listed ☐ Other

Deputized Person:

Location:

Notes:

☐ Avoiding Service ☐ Deputized Person ☐ Posted on Property ☐ Executed ☐ Refused Service

I certify that I personally delivered to WILSON RONALD KEITH on 11/17/2022

By:

D.S. Copy mailed to defendant on _____

JACKSON, LONNIE L

MCSO Civil Division
510 S. Royal St.
Mobile, AL 36603
(251) 574-2423

Christi Moak



ELECTRONICALLY FILED
1/5/2023 2:32 PM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
SHARLA KNOX, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA)	
)	
V.)	Case No.: DC-2022-010413.00
)	
KYLES PAUL DEANDRE)	
Defendant.)	

ORDER

(X) Defendant in court (X) w/attorney Willie Huntley.

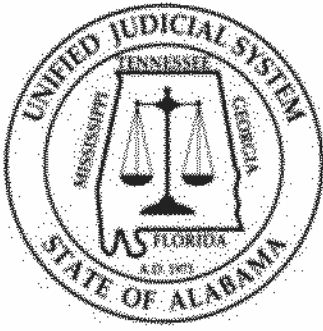
(X) Defendant (X) Defendant Attorney Waives Preliminary Hearing to Grand Jury.

(X) Bond remains in effect.

ADDITIONAL: The Defendant is not allowed to have any dogs on property.

DONE this 5th day of January, 2023.

/s/ GEORGE M. ZOGHBY
DISTRICT JUDGE



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: HUNTLEY WILLIE JULIUS JR.
huntfirm@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

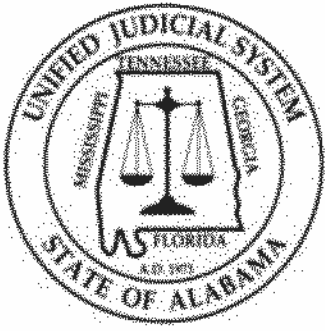
STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following matter was FILED on 1/5/2023 2:32:35 PM

Notice Date: 1/5/2023 2:32:35 PM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: KYLES PAUL DEANDRE
632 GHERIG AVE
PRICHARD, AL, 36610-0000

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following matter was FILED on 1/5/2023 2:32:35 PM

Notice Date: 1/5/2023 2:32:35 PM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov

(A) SJIS Display - PASSPORT

Friday, January 6, 2023, 9:56:52 AM

FE52 CRIMINAL FEE SHEET SITE: 02 MOBILE COUNTY OFC: 4
 CASE: DC 2022 010413 00 PARTY: D 001 KYLES PAUL DEANDRE DOB: 04281975
 PAYMENT: AMT: 0000000000 ITEM: KK: DSB: DC20192 ALT: 00000
 PRNTR: P #CPY: 2

CRTACT: V WAIVED TO GJURY 01062023 WAR: RCL: CMP: N SPRO: Y EST: N PST: H
 DATE: 1 01052023 DESC: PLMH Q: 001 FRE: L AMOUNT: 0000000000 DUE DATE: 00000000

-----< ACCOUNTS W/OUTSTANDING BALANCES ONLY: N >-----

A	P	TRANS	AMT	S	F	A	PR	NO	ACCT	TO	TOTAL DUE	AMT PAID	BALANCE	HOLD	AMT
A				A	N		15	00	CF80		0000003400				
A				A	N		11	01	SF30		0000000800				

CASE GRAND TOTALS:

COMMENT:

*** HERE ARE THE SUGGESTED FEES - PRESS ENTER TO ACCEPT/F5 TO REJECT ***
 01=MNU 02=FEE 03=NDX 04=PTY 05=CLR 06=OCS 07=SUG 08=ENF 09=D\$\$ 10=PHT 11=FWD
 12=FIL 13=SNT 14=NXC 15=NXN 16=NAB 17=BOT 18=SAB 19=PRT 20=OFF 22=PFM 24=HLP



ELECTRONICALLY FILED
2/23/2023 3:41 PM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
SHARLA KNOX, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA
CRIMINAL DIVISION

STATE OF ALABAMA,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO.: DC-2022-010413.00
)	
PAUL DEANDRE KYLES,)	
)	
Defendant.)	

MOTION FOR RETURN OF SEIZED PROPERTY

Comes now the Defendant in the above-styled matter and requests this Honorable Court to grant Defendant's Motion. In support thereof the Defendant would show the following:

1. On November 2, 2022, officers with the Mobile County Sheriff's Department executed a search warrant at the residence of Kyles. The basis of the search warrant was to obtain items related to animal abuse or neglect or dog fighting including but not limited to:

a. All dog fighting paraphernalia, treadmills, cat-mills, exercise wheels, hides or other material used as hanging devices to strengthen or condition dogs; collars, leashes, chains, and other devices used to exercise or restrain fighting dogs; wooden sticks or handles used to pry open dogs' jaws; weight scales; any washtubs, buckets, pails, and sponges used to wash dogs; any books, magazines, photographs,

videotapes, or writings that may contain material that depicts or promotes dog fighting, training or conditioning of dogs for dog fighting; any awards, trophies, plaques, or ribbons promoting or relating to dog fighting;

b. All portable carrying cases and pens; antibiotics, drugs, or vitamins used to treat injured dogs or to enhance their performance; needles and syringes used for the administration of such drugs;

c. Any pit bull terrier/ fighting dog or other animal carcasses which are buried on the property;

d. Any flooring or wall components displaying evidence of dog blood, fur or other animal matter;

e. Deposits of blood, fur or other animal matter located on the property;

f. Any and all materials reflecting the destruction of evidence at that location, including destroyed, damaged or tampered with flooring;

g. Soil, blood, fur, vegetation, insects and similar samples from the property to be used for forensic testing;

h. U.S. Currency, money ledgers, etc.

Kyles was at the residence at the time the warrant was executed. Kyles was searched at the residence and placed under arrest without mirandizing him. The officers seized the following various items in the residence and vehicles located on the property.

a. Seized from a safe in the attic of residence belonging to Mrs. Kyles was \$25,000.00 in U.S. Currency;

b. Removed from top of chest of drawers in master bedroom (Room #9), three (3) watches, six (6) silver and/or gold necklaces, three (3) bracelets, three (3) rings 2 diamond wedding rings his/her and 1 wedding band and three (3) set of earrings;

c. Removed from Room #9 master bedroom closet, one red and black MCM leather backpack, one (1) brown and black MCM billfold containing credit cards issued to Paul Kyles, Sr., three (3) folded bands and loose U.S. Currency totaling \$6,000.00 in U.S. Currency;

d. Room #9, Closed – Black Gucci box with assorted paper work, miscellaneous envelopes with assorted paper work pertaining to taxes, businesses, and properties, 2 passports belonging to Mr. & Mrs. Kyles, 1 passport card and Al issued pistol permit belonging to Mrs. Kyles, a Taurus 709 9mm pistol , TJX27473, one (1) Rossi RS22, 22 LR, S/N 7CA 338464R belonging to Mrs. Kyles, and two (2) thumb drives from top of chest of drawers in wooden box, one (1) Taurus 9mm handgun box with assorted live ammunition; one (1) box of 22 long rifle ammunition, top of dresser assorted paperwork and small black safe with assorted paperwork;

e. Removed from a black Tahoe bearing Alabama license plates of 2AOE8R7 one (1) black trac-phone flip-phone, one (1) smart watch, and one (1) receipt;

f. Removed from the person of Delondon Kyles one (1) black iPhone in a purple case and one (1) apple smart watch \$2,000.00 U.S. Currency;

g. Removed from Room #9 top of dresser one (1) black iPhone belonging to Paul Kyles, Sr.

2. The search warrant failed to establish the seized items constituted animal cruelty abuse or neglect proceeds.

3. The State has failed to file any legal action to forfeit the above listed items within the allotted legal time frame.

WHEREFORE, Defendant would ask this Court to grant the motion and return Defendant's property.

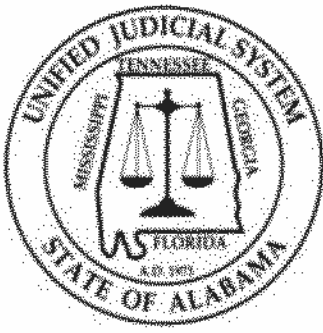
/s/ Willie J. Huntley, Jr.
Attorney for Defendant
Willie J. Huntley, Jr. (HUN009)
The Huntley Firm, P.C.
Post Office Box 370
Mobile, Alabama 36601
(251) 232-0143 – Phone
huntfirm@bellsouth.net

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing with the Clerk of the Court using the AlaFile system which will send notification of such filing to the following on the 23rd day of February, 2023.

Mobile County District Attorney's Office

/s/ Willie J. Huntley, Jr.
Of Counsel



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: WILLIE JULIUS HUNTLEY JR.
huntfirm@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following matter was FILED on 2/23/2023 3:41:48 PM

D001 KYLES PAUL DEANDRE

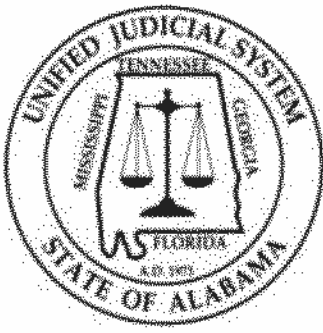
MOTION FOR RETURN OF SEIZED PROPERTY

[Filer: HUNTLEY WILLIE JULIUS JR.]

Notice Date: 2/23/2023 3:41:48 PM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: BLANCHARD JACQUELINE MARY
jacquelineblanchard@mobileda.org

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following matter was FILED on 2/23/2023 3:41:48 PM

D001 KYLES PAUL DEANDRE

MOTION FOR RETURN OF SEIZED PROPERTY

[Filer: HUNTLEY WILLIE JULIUS JR.]

Notice Date: 2/23/2023 3:41:48 PM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



ELECTRONICALLY FILED
3/1/2023 8:51 AM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
SHARLA KNOX, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA

)

V.

)

) Case No.: DC-2022-010413.00

)

KYLES PAUL DEANDRE
Defendant.

)

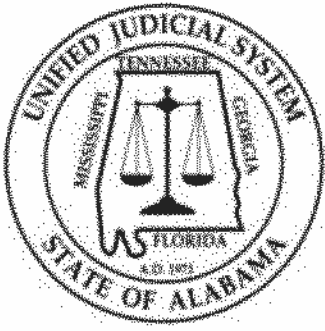
)

ORDER

MOTION FOR RETURN OF SEIZED PROPERTY filed by KYLES PAUL DEANDRE is hereby set for hearing on March 14, 2023 at 8:30 a.m. in courtroom 4100.

DONE this 1st day of March, 2023.

/s/ GEORGE M. ZOGHBY
DISTRICT JUDGE



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: BLANCHARD JACQUELINE MARY
jacquelineblanchard@mobileda.org

NOTICE OF COURT ACTION

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

A court action was entered in the above case on 3/1/2023 8:51:35 AM

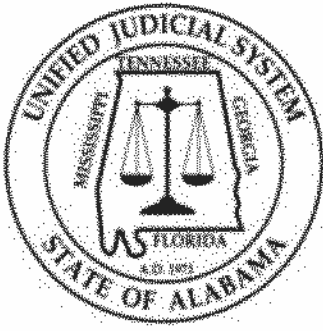
ORDER

[Filer:]

Disposition: OTHER
Judge: GMZ
Notice Date: 3/1/2023 8:51:35 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: HUNTLEY WILLIE JULIUS JR.
huntfirm@bellsouth.net

NOTICE OF COURT ACTION

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

A court action was entered in the above case on 3/1/2023 8:51:35 AM

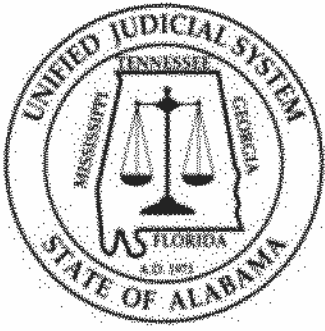
ORDER

[Filer:]

Disposition: OTHER
Judge: GMZ
Notice Date: 3/1/2023 8:51:35 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: KYLES PAUL DEANDRE
632 GHERIG AVE
PRICHARD, AL, 36610-0000

NOTICE OF COURT ACTION

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

A court action was entered in the above case on 3/1/2023 8:51:35 AM

ORDER

[Filer:]

Disposition: OTHER
Judge: GMZ
Notice Date: 3/1/2023 8:51:35 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



ELECTRONICALLY FILED
3/14/2023 12:33 PM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
SHARLA KNOX, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA

)

V.

)

) Case No.: DC-2022-010413.00

)

KYLES PAUL DEANDRE

)

Defendant.

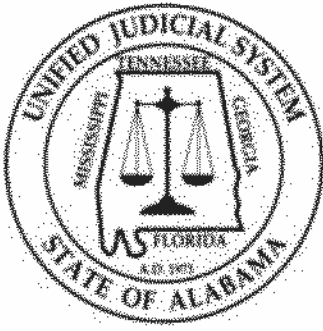
)

ORDER

The Defendant and Attorney Willie Huntley in court. This case is reset to March 21, 2023 at 8:30 a.m. in courtroom 4100.

DONE this 14th day of March, 2023.

/s/ GEORGE M. ZOGHBY
DISTRICT JUDGE



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: HUNTLEY WILLIE JULIUS JR.
huntfirm@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

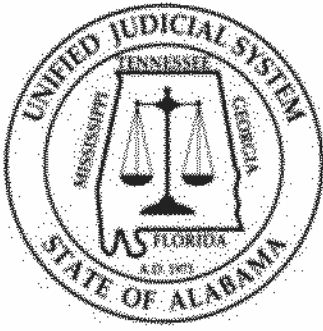
STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following matter was FILED on 3/14/2023 12:33:51 PM

Notice Date: 3/14/2023 12:33:51 PM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: KYLES PAUL DEANDRE
632 GHERIG AVE
PRICHARD, AL, 36610-0000

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following matter was FILED on 3/14/2023 12:33:51 PM

Notice Date: 3/14/2023 12:33:51 PM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



ELECTRONICALLY FILED
3/21/2023 11:45 AM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
SHARLA KNOX, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA

)

V.

)

) Case No.: DC-2022-010413.00

)

KYLES PAUL DEANDRE

)

Defendant.

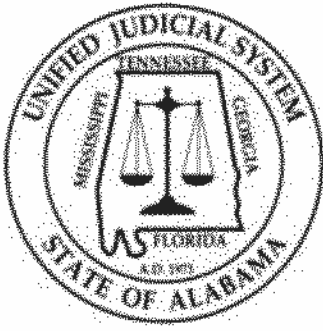
)

ORDER

Attorney Willie Huntley in court. The Defendant's Motion For Return of Seized Property is DENIED.

DONE this 21st day of March, 2023.

/s/ GEORGE M. ZOGHBY
DISTRICT JUDGE



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: HUNTLEY WILLIE JULIUS JR.
huntfirm@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

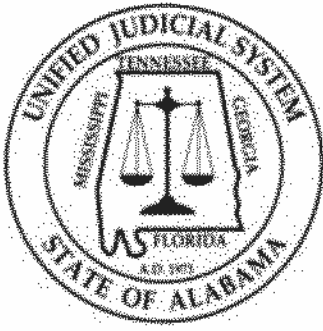
STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following matter was FILED on 3/21/2023 11:45:53 AM

Notice Date: 3/21/2023 11:45:53 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: KYLES PAUL DEANDRE
632 GHERIG AVE
PRICHARD, AL, 36610-0000

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following matter was FILED on 3/21/2023 11:45:53 AM

Notice Date: 3/21/2023 11:45:53 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



ELECTRONICALLY FILED
5/8/2023 10:59 AM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
SHARLA KNOX, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA,

Plaintiff,

v.

PAUL DEANDRE KYLES,

Defendant.

*
*
*
*
*
*
*
*
*

CASE NO.: DC22-10413

NOTICE OF APPEARANCE

COMES NOW, MEGAN KAY ALLGOOD, and does hereby file this her Notice of Appearance as she has been retained to represent the Defendant, Paul Deandre Kyles, in the above styled proceeding.

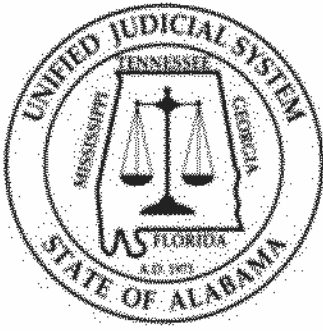
/S/ Megan Kay Allgood
Megan Kay Allgood (ALL105)
Attorney for the Defendant
P.O. Box 66174
Mobile, AL 36660
(251)479-1477 office
(251)650-3843 fax
megan@equalizingjustice.com

CERTIFICATE OF SERVICE

I do hereby certify that I have on this the 8th day of May 2023, served a copy of the foregoing via Alafile to the following:

Jessica Catlin
jessicacatlin@mobileda.org

/s/ Megan Kay Allgood
Megan Kay Allgood



AlaFile E-Notice

02-DC-2022-010413.00

To: MEGAN KAY ALLGOOD
megan@equalizingjustice.com

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

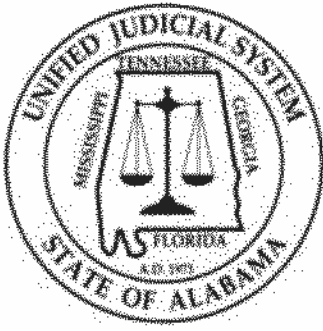
STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following NOTICE OF APPEARANCE was FILED on 5/8/2023 10:59:07 AM

Notice Date: 5/8/2023 10:59:07 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

To: CATLIN JESSICA BRADI-LEE
jessicacatlin@mobileda.org

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

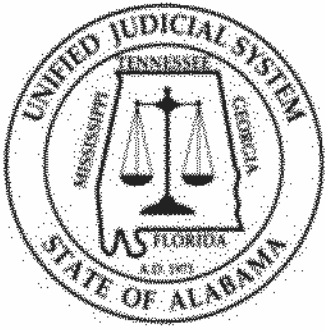
STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following NOTICE OF APPEARANCE was FILED on 5/8/2023 10:59:07 AM

Notice Date: 5/8/2023 10:59:07 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

To: HUNTLEY WILLIE JULIUS JR.
huntfirm@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following NOTICE OF APPEARANCE was FILED on 5/8/2023 10:59:07 AM

Notice Date: 5/8/2023 10:59:07 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



ELECTRONICALLY FILED
5/8/2023 11:01 AM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
SHARLA KNOX, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA,

*

PLANTIFF,

*

CASE NO.: DC22-10413;

*

DC22-7477

v.

*

PAUL KYLES,

*

Defendant.

*

EMERGENCY MOTION TO RETURN PROPERTY

COMES NOW, the Defendant, Paul Kyles, by and through undersigned counsel, and does hereby file this Motion to Return Property, and would show unto this Honorable Court as follows:

1. The Defendant was arrested on or about November 2, 2022, in the above-styled case.
2. At the Defendant's time of arrest, items were confiscated.
3. The Defendant is currently set for trial in Federal court (1:23-cr-00047) on May 30, 2023.
4. The State has property that is critical to the defense in the federal case.
5. The Defense requests this matter be set for motion hearing and the State provide the Defense with a list of all items currently in its and its agent's possession.
6. The Defense requests immediate release of all documents confiscated, in the State's and its agent's possession.

WHEREFORE, the Defendant respectfully requests that this Motion to Release Property be granted, and the Defendant prays for such other, further, and different relief to which he may be entitled, the premises considered.

Respectfully submitted,

/s/Megan Kay Allgood
Megan Kay Allgood (ALL105)
Attorney for the Defendant
P.O. Box 66174
Mobile, AL 36660
(251) 479-1477 Phone
(251) 650-3843 Fax
megan@equalizingjustice.com

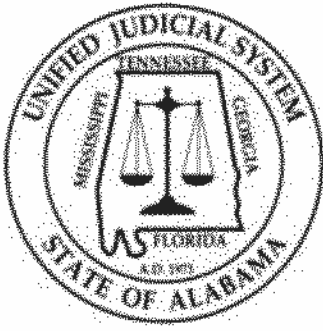
CERTIFICATE OF SERVICE

I do hereby certify that I have on this the 8th day of May 2023, served a copy of this pleading via CM/ECF on the following:

Jessica Catlin
jessicacatlin@mobileda.org

Nicholas Frisella
nicholasfrisella@mobileda.org

/s/Megan Kay Allgood
Megan Kay Allgood (ALL105)



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: MEGAN KAY ALLGOOD
megan@equalizingjustice.com

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

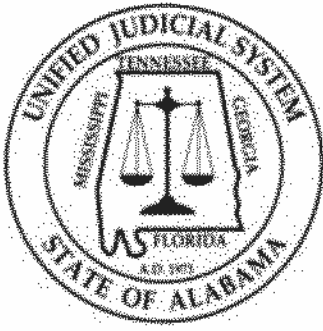
The following matter was FILED on 5/8/2023 11:01:49 AM

D001 KYLES PAUL DEANDRE
MOTION TO RETURN PROPERTY
[Filer: ALLGOOD MEGAN KAY]

Notice Date: 5/8/2023 11:01:49 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: CATLIN JESSICA BRADI-LEE
jessicacatlin@mobileda.org

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

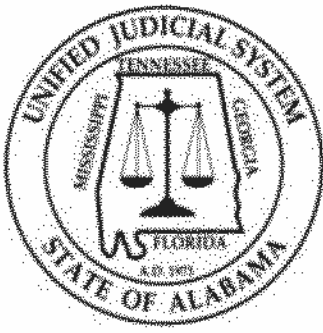
The following matter was FILED on 5/8/2023 11:01:49 AM

D001 KYLES PAUL DEANDRE
MOTION TO RETURN PROPERTY
[Filer: ALLGOOD MEGAN KAY]

Notice Date: 5/8/2023 11:01:49 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: HUNTLEY WILLIE JULIUS JR.
huntfirm@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

The following matter was FILED on 5/8/2023 11:01:49 AM

D001 KYLES PAUL DEANDRE
MOTION TO RETURN PROPERTY
[Filer: ALLGOOD MEGAN KAY]

Notice Date: 5/8/2023 11:01:49 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



ELECTRONICALLY FILED
5/10/2023 7:11 AM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
SHARLA KNOX, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA

)

V.

)

) Case No.: DC-2022-010413.00

)

KYLES PAUL DEANDRE

)

Defendant.

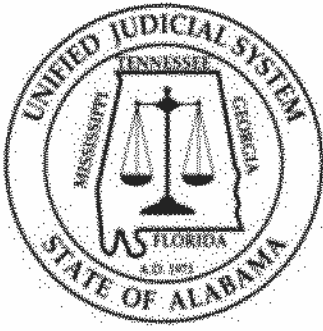
)

ORDER

MOTION TO RETURN PROPERTY filed by KYLES PAUL DEANDRE is hereby set for hearing on May 10, 2023 at 8:30 a.m. in courtroom 4100.

DONE this 10th day of May, 2023.

/s/ GEORGE M. ZOGHBY
DISTRICT JUDGE



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: CATLIN JESSICA BRADI-LEE
jessicacatlin@mobileda.org

NOTICE OF COURT ACTION

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

A court action was entered in the above case on 5/10/2023 7:11:33 AM

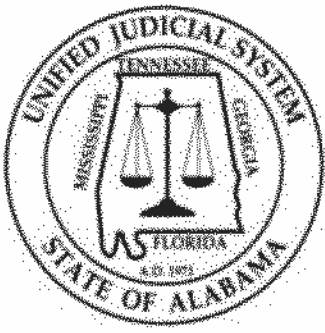
ORDER

[Filer:]

Disposition: OTHER
Judge: GMZ
Notice Date: 5/10/2023 7:11:33 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: HUNTLEY WILLIE JULIUS JR.
huntfirm@bellsouth.net

NOTICE OF COURT ACTION

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

A court action was entered in the above case on 5/10/2023 7:11:33 AM

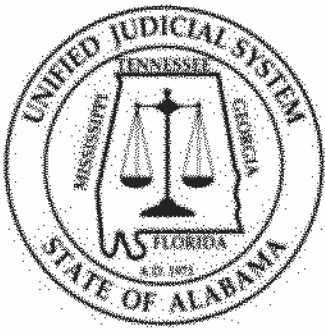
ORDER

[Filer:]

Disposition: OTHER
Judge: GMZ
Notice Date: 5/10/2023 7:11:33 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: ALLGOOD MEGAN KAY
megan@equalizingjustice.com

NOTICE OF COURT ACTION

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

A court action was entered in the above case on 5/10/2023 7:11:33 AM

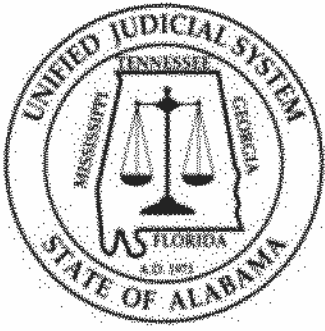
ORDER

[Filer:]

Disposition: OTHER
Judge: GMZ
Notice Date: 5/10/2023 7:11:33 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



AlaFile E-Notice

02-DC-2022-010413.00

Judge: GEORGE M. ZOGHBY

To: KYLES PAUL DEANDRE
632 GHERIG AVE
PRICHARD, AL, 36610-0000

NOTICE OF COURT ACTION

IN THE COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA V. KYLES PAUL DEANDRE
02-DC-2022-010413.00

A court action was entered in the above case on 5/10/2023 7:11:33 AM

ORDER

[Filer:]

Disposition: OTHER
Judge: GMZ
Notice Date: 5/10/2023 7:11:33 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
DISTRICT CRIMINAL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8511
sharla.knox@alacourt.gov



ELECTRONICALLY FILED
5/11/2023 12:59 PM
02-DC-2022-010413.00
DISTRICT COURT OF
MOBILE COUNTY, ALABAMA
SHARLA KNOX, CLERK

IN THE DISTRICT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA

)

V.

)

) Case No.: DC-2022-010413.00

)

KYLES PAUL DEANDRE

)

Defendant.

)

ORDER

Attorney Megan Allgood in court and waived the Defendant's appearance. The Defendant's Emergency Motion to Return Property is DENIED.

DONE this 11th day of May, 2023.

/s/ GEORGE M. ZOGHBY
DISTRICT JUDGE