

1 DAN DOW
2 DISTRICT ATTORNEY
3 STATE BAR # 237986
4 COUNTY OF SAN LUIS OBISPO
5 COURTHOUSE ANNEX, 4TH FLOOR
6 SAN LUIS OBISPO, CA 93408
7 TELEPHONE: (805) 781-5800

SAN LUIS OBISPO SUPERIOR COURT

By: J. Platt,
Deputy Clerk

<input type="checkbox"/> DV Case
<input type="checkbox"/> BOOKING REQ

In Custody

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO
DEPARTMENT

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THE PEOPLE OF THE STATE OF
CALIFORNIA

Plaintiff,

vs.

BRANDI ELAINE TURNER
DOB: 04/28/1973
ID NO. D000449366
CII: A25176657

Defendant.

COURT CASE NO. 23F-03778
COMPLAINT

DA CASE NO. 079-686968

Appearance Date:

The District Attorney of San Luis Obispo County, California, hereby accuses the
above named defendant of the following criminal offenses:

Count 1

On or about October 26, 2022, in the County of San Luis Obispo, State of California, the
crime of Murder in violation of Penal Code section 187(a), a Felony, was committed in that
BRANDI ELAINE TURNER did unlawfully, and with malice aforethought murder Q.A.H., a
human being.

1 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
2 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)

3 Count 2

4 On or about October 26, 2022, in the County of San Luis Obispo, State of California, the
5 crime of Sale of a Controlled Substance in violation of Health and Safety Code section
6 11352(a), a Felony, was committed in that BRANDI ELAINE TURNER did unlawfully sell,
7 furnish, and give away a controlled substance, to wit, fentanyl.

8 NOTICE: Fentanyl, even in very small doses, poses a high risk of death. It is extremely
9 dangerous and deadly to use, sell, furnish, or distribute fentanyl to others, alone or mixed
10 with other substances. Fentanyl is commonly mixed with other illicit drugs such as
11 cocaine, methamphetamine, heroin, and fake pharmaceutical pills. If you sell, furnish, or
12 distribute fentanyl, whether alone or mixed with other substances, and someone dies as a
13 result of ingesting the fentanyl you provided, you can be charged with manslaughter or
14 murder.

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16 Count 3

17 On or about November 9, 2022, in the County of San Luis Obispo, State of California, the
18 crime of Possession For Sale of A Controlled Substance in violation of Health and Safety
19 Code section 11351, a Felony, was committed in that BRANDI ELAINE TURNER did
20 unlawfully possess for sale a controlled substance, to wit, fentanyl.

21 NOTICE: Fentanyl, even in very small doses, poses a high risk of death. It is extremely
22 dangerous and deadly to use, sell, furnish, or distribute fentanyl to others, alone or mixed
23 with other substances. Fentanyl is commonly mixed with other illicit drugs such as
24 cocaine, methamphetamine, heroin, and fake pharmaceutical pills. If you sell, furnish, or
25 distribute fentanyl, whether alone or mixed with other substances, and someone dies as a
26 result of ingesting the fentanyl you provided, you can be charged with manslaughter or
27 murder.

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It is further alleged pursuant to Penal Code Section 1170(b)(2) that one or more of the following factors in aggravation listed in California Rule of Court 4.421 may apply to the defendant(s) or to conduct of the defendant(s):

4.421(a)(1) The crime involved great violence, great bodily harm, threat of great bodily harm, and other acts disclosing a high degree of cruelty, viciousness and callousness.

4.421(a)(3) The victim was particularly vulnerable.

4.421(a)(4) The defendant induced others to participate in the commission of the crime and occupied a position of leadership and dominance of other participants in its commission.

4.421(a)(7) The defendant is charged with other crimes for which consecutive sentences can be imposed but for which concurrent sentences shall be imposed.

4.421(a)(8) The manner in which the crime was carried out indicates planning, sophistication, and professionalism.

4.421(a)(11) The defendant took advantage of a position of trust and confidence to commit the offense.

4.421(b)(1) The defendant has engaged in violent conduct that indicates a serious danger to society.

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

3 I declare that an investigation has been conducted to determine if said Defendant
4 did commit the stated crime, which reports are attached hereto and incorporated herein by
5 reference, and that the facts therein show probable cause that the said Defendant did
6 commit the crime. Your declarant requests the issuance of a Warrant of Arrest either if
7 said Defendant do not appear voluntarily in response to an appearance letter, or if no
8 appearance letter was issued.

9 **Discovery Request:** Pursuant to Penal Code Section 1054.5(b), the People are
10 hereby informally requesting that defense counsel provide discovery to the people as
11 required by Penal Code Section 1054.3.

12 On this day May 16, 2023, in the County of San Luis Obispo, I certify and declare
13 under penalty of perjury that the foregoing is true and correct.

14 Dated: May 16, 2023

15 DAN DOW
16 DISTRICT ATTORNEY

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19 By: 

20 ERIC J. DOBROTH
21 ASSISTANT DISTRICT ATTORNEY

22 Upon review of the reports attached and incorporated herein by reference, I find sufficient
23 probable cause to warrant the defendant continued detention.

24 Dated: _____
25 _____
26 Judge of the Superior Court

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SUMMARY PAGE

Cnt	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC187(a)		Brandi Elaine Turner		
2	HS11352(a)		Brandi Elaine Turner		
3	HS11351		Brandi Elaine Turner		