

Electronically
FILED:05/19/2020
San Luis Obispo Superior Court
By: Pudas, Stacie

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

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

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8 SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO
9 DEPARTMENT

10
11 THE PEOPLE OF THE STATE OF
CALIFORNIA

Plaintiff,

COURT CASE NO. *20F-03205*

COMPLAINT

12
13 vs.

14 **TIMOTHY CLARK WOLFE**
DOB: 04/02/1998 ID NO. D000433068
15 AKA TIMOTHY WOLFE

DA CASE NO. 079-652304

16
17 Defendant.

Appearance Date:

18
19 The District Attorney of San Luis Obispo County, California, hereby accuses the
20 above named defendant of the following criminal offenses:

21 Count 1

22 On or about March 8, 2020, in the County of San Luis Obispo, State of California, the
23 crime of Murder in violation of PC187(a), a Felony, was committed in that TIMOTHY
24 CLARK WOLFE did unlawfully, and with malice aforethought murder E.S.V., a human
25 being.

26 NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
27 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)

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Count 2

On or about March 8, 2020, in the County of San Luis Obispo, State of California, the crime of Sale of a Controlled Substance in violation of HS11352(a), a Felony, was committed in that TIMOTHY CLARK WOLFE did unlawfully sell and furnish a controlled substance, to wit, Fentanyl.

NOTICE: Conviction of this offense will require you to register pursuant to Health and Safety Code section 11590. Failure to do so is a crime pursuant to Health and Safety Code section 11594.

Count 3

On or about March 9, 2020, in the County of San Luis Obispo, State of California, the crime of Possession for Sale of a Controlled Substance in violation of HS11351, a Felony, was committed in that TIMOTHY CLARK WOLFE did unlawfully possess for sale and purchase for sale a controlled substance, to wit, Alprazolam and Promethazine.

NOTICE: Conviction of this offense will require you to register pursuant to Health and Safety Code section 11590. Failure to do so is a crime pursuant to Health and Safety Code section 11594.

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(s)
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(s) did
6 commit the crime. Your declarant requests the issuance of a Warrant of Arrest either if
7 said Defendant(s) 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 18, 2020, 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 18, 2020

15 DAN DOW
16 DISTRICT ATTORNEY

17 By: _____
18 ERIC DOBROTH
19 ASSISTANT DISTRICT ATTORNEY

20 Upon review of the reports attached and incorporated herein by reference, I find sufficient
21 probable cause to warrant the defendant(s) continued detention.

22 Dated: _____
23 _____
24 Judge of the Superior Court

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SUMMARY PAGE

| Cnt | Charge | Range | Defendant(s) | Special Allegation | Effect |
|-----|------------|-------|---------------------|--------------------|--------|
| 1 | PC187(a) | | Timothy Clark Wolfe | | |
| 2 | HS11352(a) | | Timothy Clark Wolfe | | |
| 3 | HS11351 | | Timothy Clark Wolfe | | |
| | | | | | |