

ELECTRONICALLY  
FILED  
9/11/2024 10:20 AM

SAN LUIS OBISPO SUPERIOR COURT  
By: T. Chavez,  
Deputy Clerk

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

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

8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF SAN LUIS OBISPO

10  
11 THE PEOPLE OF THE STATE OF CALIFORNIA  
12 Plaintiff,

COURT CASE NO. 24F-06210  
COMPLAINT

13 vs.

14 **MICHELLE MARIE MORROW**  
15 DOB: 11/16/1968  
16 ID NO.  
17 CII:  
18 AKA MICHELLE M MORROW

**DA CASE NO. 079-698438**

19 Defendant.

Appearance Date:

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

22 Count 1

23 On or about January 15, 2024, in the County of San Luis Obispo, State of California, the  
24 crime of Voter Registration Fraud in violation of Elections Code Section 18100(a), a  
25 Felony, was committed in that MICHELLE MARIE MORROW willfully and unlawfully  
26 caused, procured and allowed herself to be registered as a voter, knowing that she was  
27 not entitled to registration.

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Count 2

On or about February 16, 2024, in the County of San Luis Obispo, State of California, the crime of Filing False Nomination Or Declaration Papers in violation of Elections Code Section 18203, a Felony, was committed in that MICHELLE MARIE MORROW did willfully and unlawfully file and submit for filing a nomination paper and declaration of candidacy knowing that it and any part of it has been made falsely.

Count 3

On or about February 16, 2024, in the County of San Luis Obispo, State of California, the crime of Perjury By Declaration in violation of Penal Code Section 118(a), a Felony, was committed in that MICHELLE MARIE MORROW did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: her qualifications to run for office of Member of the County Board of Supervisors.

Count 4

On or about March 5, 2024, in the County of San Luis Obispo, State of California, the crime of Fraudulent Voting in violation of Elections Code Section 18560(a), a Felony, was committed in that MICHELLE MARIE MORROW, while not being entitled to vote at an election, fraudulently voted and attempted to vote at an election.

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)(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)(6) The defendant threatened witnesses, unlawfully prevented and dissuaded witnesses from testifying, suborned perjury, and in any other way illegally interfered with the judicial process.

1 4.421(a)(7) The defendant is charged with other crimes for which consecutive sentences  
2 can be imposed but for which concurrent sentences shall be imposed.

3 4.421(a)(8) The manner in which the crime was carried out indicates planning,  
4 sophistication, and professionalism.

5 4.421(a)(11) The defendant took advantage of a position of trust and confidence to commit  
6 the offense.

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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 September 9, 2024, in the County of San Luis Obispo, I certify and  
13 declare under penalty of perjury that the foregoing is true and correct.

14 Dated: September 9, 2024

15 DAN DOW  
16 DISTRICT ATTORNEY

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19 By: \_\_\_\_\_  
20 BEN G BLUMENTHAL  
21 DEPUTY DISTRICT ATTORNEY

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

24 Dated: \_\_\_\_\_  
25 \_\_\_\_\_  
26 Judge of the Superior Court

SUMMARY PAGE

Cnt	Charge	Range	Defendant(s)	Special Allegation	Effect
1	EL18100(a)		Michelle Marie Morrow		
2	EL18203		Michelle Marie Morrow		
3	PC118(a)		Michelle Marie Morrow		
4	EL18560(a)		Michelle Marie Morrow		

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