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8 Attorneys for Plaintiff
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10 IN THE SUPERIOR COURT, STATE OF CALIFORNIA
11 COUNTY OF ORANGE, CENTRAL DIVISION
12

13 PEOPLE OF THE STATE OF CALIFORNIA,

14 Plaintiff,

15 v.

16 CHRISTINE MURRAY
(DOB 03/01/61)

17 Defendant.
18

CASE NO.

MISDEMEANOR
COMPLAINT

19
20 I, the undersigned, hereby certify, or on information and belief:

21 **COUNT 1 (Gov't. Code, § 3205)**

22 **SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS**

23 That on or about May 14, 2005 to May 15, 2005, in the County of Orange,
24 State of California, the crime of Solicitation of Political Funds and Contributions from other
25 officers and employees of a local agency in violation of SECTION 3205, of the
26 GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who
27 at the time and place last stated, being an officer and employee of a local agency, to wit,
28 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit

1 political funds and contributions knowingly from other officers and employees of said local
2 agency and from persons on the employment lists of said local agency, to wit, CAPTAIN
3 JOHN DAVIS.

4 **COUNT 2 (Gov't. Code, § 3205)**

5 **SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS**

6 That on or about May 14, 2005 to May 15, 2005, in the County of Orange,
7 State of California, the crime of Solicitation of Political Funds and Contributions from other
8 officers and employees of a local agency in violation of SECTION 3205, of the
9 GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who
10 at the time and place last stated, being an officer and employee of a local agency, to wit,
11 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit
12 political funds and contributions knowingly from other officers and employees of said local
13 agency and from persons on the employment lists of said local agency, to wit, CAPTAIN
14 DEANA BERGQUIST.

15 **COUNT 3 (Gov't. Code, § 3205)**

16 **SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS**

17 That on or about May 14, 2005 to May 15, 2005, in the County of Orange,
18 State of California, the crime of Solicitation of Political Funds and Contributions from other
19 officers and employees of a local agency in violation of SECTION 3205, of the
20 GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who
21 at the time and place last stated, being an officer and employee of a local agency, to wit,
22 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit
23 political funds and contributions knowingly from other officers and employees of said local
24 agency and from persons on the employment lists of said local agency, to wit, CAPTAIN
25 GEORGE HARDING.

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28 ///

1 at the time and place last stated, being an officer and employee of a local agency, to wit,
2 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit
3 political funds and contributions knowingly from other officers and employees of said local
4 agency and from persons on the employment lists of said local agency, to wit,
5 LIEUTENANT JEFFREY BARDZIK.

6 **COUNT 7 (Gov't. Code, § 3205)**

7 **SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS**

8 That on or about May 14, 2005 to May 15, 2005, in the County of Orange,
9 State of California, the crime of Solicitation of Political Funds and Contributions from other
10 officers and employees of a local agency in violation of SECTION 3205, of the
11 GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who
12 at the time and place last stated, being an officer and employee of a local agency, to wit,
13 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit
14 political funds and contributions knowingly from other officers and employees of said local
15 agency and from persons on the employment lists of said local agency, to wit, DIRECTOR
16 DEAN GIALAMAS.

17 **COUNT 8 (Gov't. Code, § 3205)**

18 **SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS**

19 That on or about May 14, 2005 to May 15, 2005, in the County of Orange,
20 State of California, the crime of Solicitation of Political Funds and Contributions from other
21 officers and employees of a local agency in violation of SECTION 3205, of the
22 GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who
23 at the time and place last stated, being an officer and employee of a local agency, to wit,
24 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit
25 political funds and contributions knowingly from other officers and employees of said local
26 agency and from persons on the employment lists of said local agency, to wit,
27 LIEUTENANT STEVEN HOWIESON.

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2 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit
3 political funds and contributions knowingly from other officers and employees of said local
4 agency and from persons on the employment lists of said local agency, to wit,
5 LIEUTENANT MICHAEL TYNES.

6 **COUNT 12(Gov't. Code, § 3205)**

7 **SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS**

8 That on or about May 14, 2005 to May 15, 2005, in the County of Orange,
9 State of California, the crime of Solicitation of Political Funds and Contributions from other
10 officers and employees of a local agency in violation of SECTION 3205, of the
11 GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who
12 at the time and place last stated, being an officer and employee of a local agency, to wit,
13 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit
14 political funds and contributions knowingly from other officers and employees of said local
15 agency and from persons on the employment lists of said local agency, to wit, DIRECTOR
16 SUSAN MARKEY.

17 **COUNT 13(Gov't. Code, § 3205)**

18 **SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS**

19 That on or about May 14, 2005 to May 15, 2005, in the County of Orange,
20 State of California, the crime of Solicitation of Political Funds and Contributions from other
21 officers and employees of a local agency in violation of SECTION 3205, of the
22 GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who
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24 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit
25 political funds and contributions knowingly from other officers and employees of said local
26 agency and from persons on the employment lists of said local agency, to wit,
27 LIEUTENANT RICHARD PADDOCK.

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1 **COUNT 14(Gov't. Code, § 3205)**

2 **SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS**

3 That on or about May 14, 2005 to May 15, 2005, in the County of Orange,
4 State of California, the crime of Solicitation of Political Funds and Contributions from other
5 officers and employees of a local agency in violation of SECTION 3205, of the
6 GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who
7 at the time and place last stated, being an officer and employee of a local agency, to wit,
8 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit
9 political funds and contributions knowingly from other officers and employees of said local
10 agency and from persons on the employment lists of said local agency, to wit,
11 LIEUTENANT GARY SMITH.

12 **COUNT 15(Gov't. Code, § 3205)**

13 **SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS**

14 That on or about May 14, 2005 to May 15, 2005, in the County of Orange,
15 State of California, the crime of Solicitation of Political Funds and Contributions from other
16 officers and employees of a local agency in violation of SECTION 3205, of the
17 GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who
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19 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit
20 political funds and contributions knowingly from other officers and employees of said local
21 agency and from persons on the employment lists of said local agency, to wit, CAPTAIN
22 BRIAN WILKERSON.

23 **COUNT 16(Gov't. Code, § 3205)**

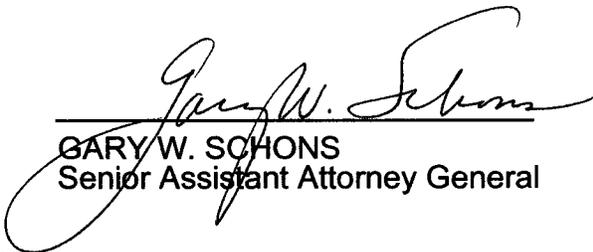
24 **SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS**

25 That on or about May 14, 2005 to May 15, 2005, in the County of Orange,
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28 GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who

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2 the ORANGE COUNTY SHERIFF'S DEPARTMENT, did directly and indirectly solicit
3 political funds and contributions knowingly from other officers and employees of said local
4 agency and from persons on the employment lists of said local agency, to wit,
5 LIEUTENANT DONALD TURRENTINE.

6 Pursuant to Penal Code section 1054.5(b), the People are hereby informally
7 requesting that defense counsel provide discovery to the People as required by Penal
8 Code section 1054.3.

9 I certify under the penalty of perjury that the foregoing is true and correct and
10 that this Complaint contains 16 Counts. Executed on September 1, 2005, San Diego,
11 California.

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14 
15 GARY W. SCHONS
16 Senior Assistant Attorney General

17 BAIL RECOMMENDATION: \$500