BILL LOCKYER, Attorney General
of the State of California
ROBERT A. ANDERSON,
Chief Assistant Attorney General
GARY W. SCHONS, Senior Assistant
Attorney General
California State Bar No. 72556

110 West A Street, Suite 1100
P.O. Box 85266
San Diego, California 92186-5266
Telephone: (619) 645-2275

Attorneys for Plaintiff

IN THE SUPERIOR COURT, STATE OF CALIFORNIA

COUNTY OF ORANGE, CENTRAL DIVISION

PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff, v. CHRISTINE MURRAY (DOB 03/01/61) Defendant.	CASE NO. MISDEMEANOR COMPLAINT

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

COUNT 1 (Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

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

COUNT 2 (Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

COUNT 3 (Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

///

///

///

COUNT 4 (Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

COUNT 5 (Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

COUNT 6 (Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

That on or about May 14, 2005 to May 15, 2005, in the County of Orange, State of California, the crime of Solicitation of Political Funds and Contributions from other officers and employees of a local agency in violation of SECTION 3205, of the GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who

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

COUNT 7 (Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

COUNT 8 (Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

///

COUNT 9 (Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

COUNT 10(Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

COUNT 11(Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

That on or about May 14, 2005 to May 15, 2005, in the County of Orange, State of California, the crime of Solicitation of Political Funds and Contributions from other officers and employees of a local agency in violation of SECTION 3205, of the GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who

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

COUNT 12(Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

COUNT 13(Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

///

COUNT 14(Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

COUNT 15(Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

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

COUNT 16(Gov't. Code, § 3205)

SOLICITATION OF POLITICAL FUNDS AND CONTRIBUTIONS

That on or about May 14, 2005 to May 15, 2005, in the County of Orange, State of California, the crime of Solicitation of Political Funds and Contributions from other officers and employees of a local agency in violation of SECTION 3205, of the GOVERNMENT CODE, a Misdemeanor, was committed by CHRISTINE MURRAY, who

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

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

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

GARY W. SCHONS
Senior Assistant Attorney General

BAIL RECOMMENDATION: $500