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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN JOAQUIN
12 STOCKTON BRANCH

13 THE PEOPLE OF THE STATE OF CALIFORNIA,

14 Plaintiff,

15 vs.

16 SHAKIR KHAN,

17 Defendant(s).

No. SO22-16405
SAN JOAQUIN COUNTY
SHERIFF'S OFFICE CASE
DA Case: 0936055

Complaint No: 202302151990

COMPLAINT

18 I, the undersigned, say, on information and belief, that in the County of SAN JOAQUIN, State
19 of California:

20 **COUNT 1: Code Section EL 18100(A) CAUSING/PROCURING/ALLOWING FALSE**
21 **VOTER REGISTRATION OF SELF/ANOTHER PERSON**

22 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
23 SHAKIR KHAN did did commit the crime of CAUSING/PROCURING/ALLOWING FALSE
24 VOTER REGISTRATION OF SELF/ANOTHER PERSON, in violation of Section 18100(a)
25 of the Elections Code, a FELONY, who at the time and place last aforesaid, did willfully cause,
26 procure, and allow themselves/any other person to be registered as a voter, and acted knowing
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1 themselves/another person are not entitled to this voter registration, to wit: VARIOUS
2 INDIVIDUALS.

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4 For a further and separate cause of complaint, being a different offense from but connected in
5 its commission with the charge(s) above, complainant further complains and says:

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7 **COUNT 2: Code Section EL 18101 FALSE REGISTRATION/REREGISTRATION OF**
8 **FICTITIOUS PERSON/PERSON NOT REQUESTING REGISTRATION**

9 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
10 SHAKIR KHAN did did commit the crime of FALSE REGISTRATION/REREGISTRATION
11 OF FICTITIOUS PERSON/PERSON NOT REQUESTING REGISTRATION, in violation of
12 Section 18101 of the Elections Code, a FELONY, who at the time and place last aforesaid, did
13 willfully and knowingly complete, procure the completion of, in whole and in part, an affidavit
14 of registration and voter registration card, with the intent to cause the registration or
15 reregistration as a voter of a fictitious person and any person who had not requested registration
16 or reregistration as a voter, to wit: VARIOUS INDIVIDUALS.

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18 For a further and separate cause of complaint, being a different offense from but connected in
19 its commission with the charge(s) above, complainant further complains and says:

20
21 **COUNT 3: Code Section EL 18200 SUBSCRIPTION OF FICTITIOUS NAME TO**
22 **NOMINATION PETITION**

23 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
24 SHAKIR KHAN did did commit the crime of SUBSCRIPTION OF FICTITIOUS NAME TO
25 NOMINATION PETITION, in violation of Section 18200 of the Elections Code, a FELONY,
26 who at the time and place last aforesaid, did willfully and knowingly subscribe, cause another
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1 to subscribe, a fictitious name to any nomination petition, and acted with the intent to subscribe
2 the name of another to a nomination petition, to wit: JOHN or JANE DOE.

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4 For a further and separate cause of complaint, being a different offense from but connected in
5 its commission with the charge(s) above, complainant further complains and says:

6
7 **COUNT 4: Code Section EL 18200 SUBSCRIPTION OF FICTITIOUS NAME TO**
8 **NOMINATION PETITION**

9 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
10 SHAKIR KHAN did did commit the crime of SUBSCRIPTION OF FICTITIOUS NAME TO
11 NOMINATION PETITION, in violation of Section 18200 of the Elections Code, a FELONY,
12 who at the time and place last aforesaid, did willfully and knowingly subscribe, cause another
13 to subscribe, a fictitious name to any nomination petition, and acted with the intent to subscribe
14 the name of another to a nomination petition, to wit: JOHN or JANE DOE.

15
16 For a further and separate cause of complaint, being a different offense from but connected in
17 its commission with the charge(s) above, complainant further complains and says:

18
19 **COUNT 5: Code Section EL 18200 SUBSCRIPTION OF FICTITIOUS NAME TO**
20 **NOMINATION PETITION**

21 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
22 SHAKIR KHAN did did commit the crime of SUBSCRIPTION OF FICTITIOUS NAME TO
23 NOMINATION PETITION, in violation of Section 18200 of the Elections Code, a FELONY,
24 who at the time and place last aforesaid, did willfully and knowingly subscribe, cause another
25 to subscribe, a fictitious name to any nomination petition, and acted with the intent to subscribe
26 the name of another to a nomination petition, to wit: JOHN or JANE DOE.

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1 For a further and separate cause of complaint, being a different offense from but connected in
2 its commission with the charge(s) above, complainant further complains and says:

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4 **COUNT 6: Code Section EL 18200 SUBSCRIPTION OF FICTITIOUS NAME TO**
5 **NOMINATION PETITION**

6 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
7 SHAKIR KHAN did did commit the crime of SUBSCRIPTION OF FICTITIOUS NAME TO
8 NOMINATION PETITION, in violation of Section 18200 of the Elections Code, a FELONY,
9 who at the time and place last aforesaid, did willfully and knowingly subscribe, cause another
10 to subscribe, a fictitious name to any nomination petition, and acted with the intent to subscribe
11 the name of another to a nomination petition, to wit: JOHN or JANE DOE.

12 For a further and separate cause of complaint, being a different offense from but connected in
13 its commission with the charge(s) above, complainant further complains and says:

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15 For a further and separate cause of complaint, being a different offense from but connected in
16 its commission with the charge(s) above, complainant further complains and says:

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18 **COUNT 7: Code Section EL 18200 SUBSCRIPTION OF FICTITIOUS NAME TO**
19 **NOMINATION PETITION**

20 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
21 SHAKIR KHAN did did commit the crime of SUBSCRIPTION OF FICTITIOUS NAME TO
22 NOMINATION PETITION, in violation of Section 18200 of the Elections Code, a FELONY,
23 who at the time and place last aforesaid, did willfully and knowingly subscribe, cause another
24 to subscribe, a fictitious name to any nomination petition, and acted with the intent to subscribe
25 the name of another to a nomination petition, to wit: JOHN or JANE DOE.

1 For a further and separate cause of complaint, being a different offense from but connected in
2 its commission with the charge(s) above, complainant further complains and says:

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4 **COUNT 8: Code Section EL 18200 SUBSCRIPTION OF FICTITIOUS NAME TO**
5 **NOMINATION PETITION**

6 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
7 SHAKIR KHAN did did commit the crime of SUBSCRIPTION OF FICTITIOUS NAME TO
8 NOMINATION PETITION, in violation of Section 18200 of the Elections Code, a FELONY,
9 who at the time and place last aforesaid, did willfully and knowingly subscribe, cause another
10 to subscribe, a fictitious name to any nomination petition, and acted with the intent to subscribe
11 the name of another to a nomination petition, to wit: JOHN or JANE DOE.

12
13 For a further and separate cause of complaint, being a different offense from but connected in
14 its commission with the charge(s) above, complainant further complains and says:

15
16 **COUNT 9: Code Section EL 18200 SUBSCRIPTION OF FICTITIOUS NAME TO**
17 **NOMINATION PETITION**

18 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
19 SHAKIR KHAN did did commit the crime of SUBSCRIPTION OF FICTITIOUS NAME TO
20 NOMINATION PETITION, in violation of Section 18200 of the Elections Code, a FELONY,
21 who at the time and place last aforesaid, did willfully and knowingly subscribe, cause another
22 to subscribe, a fictitious name to any nomination petition, and acted with the intent to subscribe
23 the name of another to a nomination petition, to wit: JOHN or JANE DOE.

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25 For a further and separate cause of complaint, being a different offense from but connected in
26 its commission with the charge(s) above, complainant further complains and says:

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1 **COUNT 10: Code Section EL 18203 FALSE NOMINATION/DECLARATION OF**
2 **CANDIDACY**

3 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
4 SHAKIR KHAN did did commit the crime of FALSE NOMINATION/DECLARATION OF
5 CANDIDACY, in violation of Section 18203 of the Elections Code, a FELONY, who at the
6 time and place last aforesaid, did willfully and knowingly file, submit for filing, a nomination
7 paper/declaration of candidacy, which is in whole and in part false, to wit: JOHN or JANE
8 DOE.

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10 For a further and separate cause of complaint, being a different offense from but connected in
11 its commission with the charge(s) above, complainant further complains and says:

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13 **COUNT 11: Code Section EL 18203 FALSE NOMINATION/DECLARATION OF**
14 **CANDIDACY**

15 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
16 SHAKIR KHAN did did commit the crime of FALSE NOMINATION/DECLARATION OF
17 CANDIDACY, in violation of Section 18203 of the Elections Code, a FELONY, who at the
18 time and place last aforesaid, did willfully and knowingly file, submit for filing, a nomination
19 paper/declaration of candidacy, which is in whole and in part false, to wit: JOHN or JANE
20 DOE.

21
22 For a further and separate cause of complaint, being a different offense from but connected in
23 its commission with the charge(s) above, complainant further complains and says:

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25 **COUNT 12: Code Section EL 18500 FRAUDULENT CASTING OF VOTES**

26 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
27 SHAKIR KHAN did did commit the crime of FRAUDULENT CASTING OF VOTES, in
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1 violation of Section 18500 of the Elections Code, a FELONY, who at the time and place last
2 aforesaid, did willfully commit fraud, attempt to commit fraud, aid/abet fraud, attempt to
3 aid/abet fraud, in connection with any vote cast, attempted to be cast, and to be cast in the
4 future, to wit: VARIOUS INDIVIDUALS.

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6 For a further and separate cause of complaint, being a different offense from but connected in
7 its commission with the charge(s) above, complainant further complains and says:

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9 **COUNT 13: Code Section EL 18561(a)**

10 **PROCURING/ASSISTING/COUNSELING/ADVISING ANOTHER NOT QUALIFIED**
11 **TO VOTE**

12 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
13 SHAKIR KHAN did did commit the crime of
14 PROCURING/ASSISTING/COUNSELING/ADVISING ANOTHER NOT QUALIFIED TO
15 VOTE, in violation of Section 18561(a) of the Elections Code, a FELONY, who at the time
16 and place last aforesaid, did willfully and knowingly procure, assist, counsel, advise another
17 person to give and offer their vote at any election when that other person is not qualified to vote
18 in said election.

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20 For a further and separate cause of complaint, being a different offense from but connected in
21 its commission with the charge(s) above, complainant further complains and says:

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23 **COUNT 14: Code Section EL 18561(b) AIDING AND ABETTING COMMISSION OF**
24 **FRAUDULENT VOTING**

25 On or about June 1, 2020 to November 3, 2020, in the County of San Joaquin, California,
26 SHAKIR KHAN did did commit the crime of AIDING AND ABETTING COMMISSION OF
27 FRAUDULENT VOTING, in violation of Section 18561(b) of the Elections Code, a
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1 FELONY, who at the time and place last aforesaid, did willfully aid and abet in the fraudulent
2 casting of a vote.

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4 If the above-named defendant(s) is/are presently on probation in San Joaquin County, any
5 evidence presented at a preliminary hearing in the instant case will be used not only as a basis
6 for a holding order in this case but also as evidence of a violation of probation and, at any
7 formal hearing on that violation of probation, the People will move the transcript of the
8 preliminary hearing into evidence as a basis for the violation.

9
10 That attached hereto and by this reference incorporated herein is a declaration setting forth
11 facts in support of probable cause for the issuance of warrant of arrest herein.

12
13 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that the
14 defendant and their attorney disclose to the People all information and materials described in
15 Penal Code Section 1054.3.

16
17 I declare under penalty of perjury that the foregoing is true and correct except for those things
18 stated on information and belief and those I believe to be true.

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20 Executed on February 13, 2023, at Stockton, California.

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22 _____
23 DONALD VAUGHN
24 Deputy District Attorney

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