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FILED
JUN 14 2017
STEPHEN H. NASH CLERK OF THE COURT
SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF CONTRA COSTA
By: _____, Deputy Clerk

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 IN AND FOR THE COUNTY OF CONTRA COSTA
12

13 **THE PEOPLE OF THE STATE OF**
14 **CALIFORNIA,**

Case No.

15 Plaintiffs,

FELONY COMPLAINT

16 v.

17 **MARK PETERSON,**

18 Defendant.
19

20 The Attorney General of the State of California hereby accuses Defendant, MARK
21 PETERSON, of the following charges:

22 **COUNT ONE**

23 On or about January 31, 2012, in the County of Contra Costa, the crime of PERJURY, in
24 violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did
25 willfully and unlawfully, under penalty of perjury, state as true any material matter which he
26 knew to be false, to wit: falsely state on California Form 460, Campaign Disclosure Statement,
27 that the contents therein were true when, in fact, he knew they were not.
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COUNT TWO

On or about August 31, 2012, in the County of Contra Costa, the crime of PERJURY, in violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did willfully and unlawfully, under penalty of perjury, state as true any material matter which he knew to be false, to wit: falsely state on California Form 460, Campaign Disclosure Statement, that the contents therein were true when, in fact, he knew they were not.

COUNT THREE

On or about March 4, 2013, in the County of Contra Costa, the crime of PERJURY, in violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did willfully and unlawfully, under penalty of perjury, state as true any material matter which he knew to be false, to wit: falsely state on California Form 460, Campaign Disclosure Statement, that the contents therein were true when, in fact, he knew they were not.

COUNT FOUR

On or about July 31, 2013, in the County of Contra Costa, the crime of PERJURY, in violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did willfully and unlawfully, under penalty of perjury, state as true any material matter which he knew to be false, to wit: falsely state on California Form 460, Campaign Disclosure Statement, that the contents therein were true when, in fact, he knew they were not.

COUNT FIVE

On or about January 31, 2014, in the County of Contra Costa, the crime of PERJURY, in violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did willfully and unlawfully, under penalty of perjury, state as true any material matter which he knew to be false, to wit: falsely state on California Form 460, Campaign Disclosure Statement, that the contents therein were true when, in fact, he knew they were not.

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COUNT SIX

On or about April 8, 2014, in the County of Contra Costa, the crime of PERJURY, in violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did willfully and unlawfully, under penalty of perjury, state as true any material matter which he knew to be false, to wit: falsely state on California Form 460, Campaign Disclosure Statement, that the contents therein were true when, in fact, he knew they were not.

COUNT SEVEN

On or about May 26, 2014, in the County of Contra Costa, the crime of PERJURY, in violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did willfully and unlawfully, under penalty of perjury, state as true any material matter which he knew to be false, to wit: falsely state on California Form 460, Campaign Disclosure Statement, that the contents therein were true when, in fact, he knew they were not.

COUNT EIGHT

On or about July 31, 2014, in the County of Contra Costa, the crime of PERJURY, in violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did willfully and unlawfully, under penalty of perjury, state as true any material matter which he knew to be false, to wit: falsely state on California Form 460, Campaign Disclosure Statement, that the contents therein were true when, in fact, he knew they were not.

COUNT NINE

On or about February 15, 2015, in the County of Contra Costa, the crime of PERJURY, in violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did willfully and unlawfully, under penalty of perjury, state as true any material matter which he knew to be false, to wit: falsely state on California Form 460, Campaign Disclosure Statement, that the contents therein were true when, in fact, he knew they were not.

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COUNT TEN

On or about July 29, 2015, in the County of Contra Costa, the crime of PERJURY, in violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did willfully and unlawfully, under penalty of perjury, state as true any material matter which he knew to be false, to wit: falsely state on California Form 460, Campaign Disclosure Statement, that the contents therein were true when, in fact, he knew they were not.

COUNT ELEVEN

On or about March 28, 2014, in the County of Contra Costa, the crime of PERJURY, in violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did willfully and unlawfully, under penalty of perjury, state as true any material matter which he knew to be false, to wit: falsely state on California Form 700, Statement of Economic Interest, that the contents therein were true when, in fact, he knew they were not.

COUNT TWELVE

On or about March 31, 2015, in the County of Contra Costa, the crime of PERJURY, in violation of Penal Code section 118, a Felony, was committed by MARK PETERSON, who did willfully and unlawfully, under penalty of perjury, state as true any material matter which he knew to be false, to wit: falsely state on California Form 700, Statement of Economic Interest, that the contents therein were true when, in fact, he knew they were not.

COUNT THIRTEEN

On and between January 1, 2011, and October 31, 2015, in the County of Contra Costa, the defendant, MARK PETERSON committed the crime of GRAND THEFT, in violation of PENAL CODE section 487(a) in that while defendant MARK PETERSON was an agent, servant, or employee of the "MARK PETERSON FOR DISTRICT ATTORNEY 2014" campaign committee, defendant did unlawfully take from the "MARK PETERSON FOR DISTRICT ATTORNEY 2014" campaign committee money and personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950.00), to wit \$66,372, a felony.

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ENHANCEMENT

Sentence Enhancement (Penal Code section 12022.6(a)(1))

It is further alleged that in the commission of the offense alleged in count 13, defendant MARK PETERSON, with the intent to do so and pursuant to a common scheme or plan, took funds and property of a value exceeding sixty-five thousand dollars (\$65,000), within the meaning of Penal Code section 12022.6(a)(1).

SPECIAL ALLEGATION

Statute of Limitations - Discovery Within Four Years (Penal code, §§ 801., 803(c))

Law enforcement officials discovered the crimes alleged within four years of the filing of this complaint. (Pen. Code, §803, subd.(c).) In a letter dated October 7, 2015 from the Franchise Tax Board (FTB), Defendant Mark Peterson received notice that his committee had been selected for a random FTB audit. In January of 2016, Defendant self-disclosed to the Fair Political Practices Commission that he made personal expenditures with campaign funds between 2011 and 2015. Thus, discovery of the crimes alleged occurred after October 7, 2015.

I verify under information and belief, pursuant to Penal Code section 806, that the forgoing is true and correct.

Dated: June 13, 2017

Respectfully Submitted,

XAVIER BECERRA
Attorney General of California
MAGGY KRELL
Supervising Deputy Attorney General



DAVID C. BASS
Deputy Attorney General
Attorneys for the People of the State of California