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8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF SOLANO

10 THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff

Case No. FZ4-00413

11 vs.

12  
13  
14 MATTHEW JOSEPH SHELTON (11/02/1981)  
15 aka: MATTHEW J SHELTON  
16 MATTHER JOSEPH SHELTON  
17 MATHEW J SHELTON

FELONY COMPLAINT

18  
19 Defendant

20 The undersigned is informed and believes that:

21 **COUNT 1**

22 On or about and between September 1, 2022 and December 1, 2022, defendant MATTHEW  
23 JOSEPH SHELTON did commit a felony namely: LEWD ACT UPON A CHILD, a violation of  
24 Section 288(a) of the Penal Code of the State of California, County of Solano, in that said  
25 defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with  
26 the body and certain parts and members thereof of [REDACTED] a child under the age of fourteen years,  
with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of  
the said defendant and the said child.

1 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section  
2 1192.7(c)."

3 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section  
4 290. Willful failure to register is a crime."

5 "NOTICE: Conviction of this offense will require you to provide specimens and samples  
6 pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a  
7 crime."

### 8 **COUNT 2**

9 On or about and between September 1, 2022 and December 1, 2022, defendant MATTHEW  
10 JOSEPH SHELTON did commit a felony namely: LEWD ACT UPON A CHILD, a violation of  
11 Section 288(a) of the Penal Code of the State of California, County of Solano, in that said  
12 defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with  
13 the body and certain parts and members thereof of [REDACTED] a child under the age of fourteen years,  
14 with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of  
15 the said defendant and the said child.

16 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section  
17 1192.7(c)."

18 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section  
19 290. Willful failure to register is a crime."

20 "NOTICE: Conviction of this offense will require you to provide specimens and samples  
21 pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a  
22 crime."

### 23 **COUNT 3**

24 On or about and between September 1, 2022 and December 1, 2022, defendant MATTHEW  
25 JOSEPH SHELTON did commit a felony namely: LEWD ACT UPON A CHILD, a violation of  
26 Section 288(a) of the Penal Code of the State of California, County of Solano, in that said  
defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with  
the body and certain parts and members thereof of [REDACTED] a child under the age of fourteen years,  
with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of  
the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section  
1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section  
290. Willful failure to register is a crime."



1 "NOTICE: Conviction of this offense will require you to provide specimens and samples  
2 pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a  
3 crime."

4 **COUNT 4**

5 On or about and between September 1, 2022 and December 1, 2022, defendant MATTHEW  
6 JOSEPH SHELTON did commit a felony namely: LEWD ACT UPON A CHILD, a violation of  
7 Section 288(a) of the Penal Code of the State of California, County of Solano, in that said  
8 defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with  
9 the body and certain parts and members thereof of [REDACTED] a child under the age of fourteen years,  
10 with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of  
11 the said defendant and the said child.

12 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section  
13 1192.7(c)."

14 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section  
15 290. Willful failure to register is a crime."

16 "NOTICE: Conviction of this offense will require you to provide specimens and samples  
17 pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a  
18 crime."

19 **COUNT 5**

20 On or about and between September 1, 2022 and December 2, 2022, defendant MATTHEW  
21 JOSEPH SHELTON did commit a felony namely: LEWD ACT UPON A CHILD, a violation of  
22 Section 288(a) of the Penal Code of the State of California, County of Solano, in that said  
23 defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit:  
24 touching crotch, upon and with the body and certain parts and members thereof of [REDACTED] a child  
25 under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust,  
26 passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section  
1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section  
290. Willful failure to register is a crime."

"NOTICE: Conviction of this offense will require you to provide specimens and samples  
pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a  
crime."

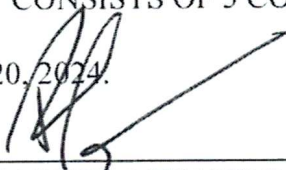
1 It is further alleged that the defendant MATTHEW JOSEPH SHELTON did commit acts which  
2 aggravate the above crime(s) pursuant to Rules 4.408 and 4.421 of the California Rules of Court.

3 **DISCOVERY REQUEST PURSUANT TO PENAL CODE SECTION 1054/1054.7:**

4 Pursuant to Penal Code sections 1054 through 1054.7, the People request that, within fifteen (15)  
5 days, the defendant and/or his/her attorney disclose: (a) The names and addresses of persons,  
6 other than the defendant, he/she intends to call as witnesses at trial, together with any relevant  
7 written or recorded statements of experts made in connection with the case, and including the  
8 results of physical or mental examinations, scientific tests, experiments, or comparisons which  
the defendant intends to offer in evidence at the trial. This request is a continuing request, to  
cover not only all such material currently in existence, but also all material which comes into  
existence to the conclusion of this case.

9 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND  
10 CORRECT AND THAT THIS COMPLAINT CONSISTS OF 5 COUNTS.

11 Executed at Vallejo, California, on February 20, 2024.

12   
13 \_\_\_\_\_  
BARRY M SHAPIRO  
14 DECLARANT AND COMPLAINANT

15 AGENCY: BENICIA POLICE  
DEPARTMENT

D.A. NO.: V240203

16  
17 Arresting Officer: ADAYA, Badge # 4458

18	DEFENDANT	CII NO	DOB	BOOKING NO	CUSTODY R'TN DATE
19	Matthew Joseph Shelton	A26054765	11/02/1981	***	



SUPERIOR COURT OF CALIFORNIA

COUNTY OF SOLANO

**FILED**  
Superior Court of California,  
County of Solano

02/23/2024

By: R. Kearney, Deputy Clerk

IN RE THE ARREST AND/OR CONFINEMENT OF

MATTHEW JOSEPH SHELTON

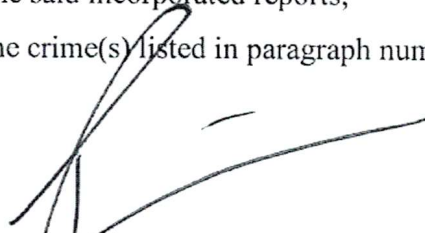
CASE NO. *F24-00413*

DECLARATION IN SUPPORT  
OF ARREST WARRANT

DECLARATION OF BARRY M SHAPIRO

I, BARRY M SHAPIRO, declare and state as follows:

1. I am a Deputy District Attorney. It is in that capacity that I submit this declaration and I do so for the purpose of obtaining an arrest warrant for the arrest of MATTHEW JOSEPH SHELTON, hereinafter referred to as "the accused";
2. There is probable cause to believe that, on or about the date(s) indicated, the accused committed the crime(s) of: PC288(a) ; PC288(a) ; PC288(a) ; PC288(a) ; PC288(a)
3. The said probable cause is exhibited in the official law enforcement reports prepared regarding the matter, a true copy of the pertinent parts of which is attached hereto and incorporated herein by reference;
4. I am informed, and on the basis of such information I believe that the conduct of the accused and the circumstances which give probable cause to believe that the accused committed the crime(s) listed in paragraph number 2 hereof were personally observed by the person(s) whose statements regarding such crime(s) are contained in the said incorporated reports, and that the facts relating to the source and reliability of such statements are as set forth in those reports;
5. A description of the accused appears in the said incorporated reports;
6. A complaint charging the accused with the crime(s) listed in paragraph number 2 hereof is outstanding.

  
\_\_\_\_\_  
BARRY M SHAPIRO  
Signature of Declarant