

THE SUPERIOR COURT, STATE OF CALIFORNIA  
For the County of Santa Barbara  
Santa Maria Division

THE PEOPLE OF THE STATE OF CALIFORNIA

vs.

MICHAEL JOE JACKSON

Plaintiff,

DOB: [REDACTED]

Defendant.

DA No. 03-12-098996  
Court No. 1133603

FELONY COMPLAINT

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA BARBARA

DEC 18 2003

The undersigned is informed and believes that:

GARY M. BLAIR, EXEC. OFFICER  
By Wonda Strand  
WONDA STRAND, Deputy Clerk

COUNT 1

On or between February 7, 2003 and March 10, 2003, in the County of Santa Barbara, the crime of LEWD ACT UPON A CHILD, in violation of PENAL CODE SECTION 288(a), a Felony, was committed by MICHAEL JOE JACKSON, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of John Doe, 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.

COUNT 2

~~On or between February 7, 2003 and March 10, 2003, in the County of Santa Barbara, the crime of LEWD ACT UPON A CHILD, in violation of PENAL CODE SECTION 288(a), a Felony, was committed by MICHAEL JOE JACKSON, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of John Doe, 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.~~

COUNT 3

On or between February 7, 2003 and March 10, 2003, in the County of Santa Barbara, the crime of LEWD ACT UPON A CHILD, in violation of PENAL CODE SECTION 288(a), a Felony, was committed by MICHAEL JOE JACKSON, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of John Doe, 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.

COUNT 4

On or between February 7, 2003 and March 10, 2003, in the County of Santa Barbara, the crime of LEWD ACT UPON A CHILD, in violation of PENAL CODE SECTION 288(a), a Felony, was committed by MICHAEL JOE JACKSON, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of John Doe, 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.

COUNT 5

On or between February 7, 2003 and March 10, 2003, in the County of Santa Barbara, the crime of LEWD ACT UPON A CHILD, in violation of PENAL CODE SECTION 288(a), a Felony, was committed by MICHAEL JOE JACKSON, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of John Doe, 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.

COUNT 6

On or between February 20, 2003 and March 10, 2003, in the County of Santa Barbara, the crime of LEWD ACT UPON A CHILD, in violation of PENAL CODE SECTION 288(a), a Felony, was committed by MICHAEL JOE JACKSON, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of John Doe, 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.

COUNT 7

On or between February 20, 2003 and March 10, 2003, in the County of Santa Barbara, the crime of LEWD ACT UPON A CHILD, in violation of PENAL CODE SECTION 288(a), a Felony, was committed by MICHAEL JOE JACKSON, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of John Doe, 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.

COUNT 8

On or between February 20, 2003 and March 10, 2003, in the County of Santa Barbara, the crime of ADMINISTERING INTOXICATING AGENT, in violation of PENAL CODE SECTION 222, a Felony, was committed by MICHAEL JOE JACKSON, who did unlawfully administer to John Doe an intoxicating agent with intent thereby to enable and assist himself to commit a felony, to wit, CHILD MOLESTATION, in violation of PENAL CODE SECTION 288(a).

COUNT 9

On or between February 20, 2003 and March 10, 2003, in the County of Santa Barbara, the crime of ADMINISTERING INTOXICATING AGENT, in violation of PENAL CODE SECTION 222, a Felony, was committed by MICHAEL JOE JACKSON, who did unlawfully administer to John Doe an intoxicating agent with intent thereby to enable and assist himself to commit a felony, to wit, CHILD MOLESTATION, in violation of PENAL CODE SECTION 288(a).

It is further alleged that Counts 1 through 7 are serious felonies within the meaning of Penal Code section 1192.7(c)(6).

As to counts 1 through 7, it is further alleged pursuant to Penal Code section 1203.066(a)(8) that the victim, John Doe, in the above offense was under the age of 14 years and MICHAEL JOE JACKSON had substantial sexual conduct with John Doe.

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

NOTICE: Pursuant to the provisions of Penal Code section 293.5 the use of pseudonym "John Doe," as it appears in the complaint, is for purposes of protecting the privacy of the alleged victim.

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

Executed at Santa Maria, California, on December 18, 2003.

  
THOMAS W. SNEDDON, JR.  
DISTRICT ATTORNEY

Agency: SBSD

DEFENDANT NAME	CHI	SEX	RACE	HGT	WGT	EYES	HAIR	DRIVER'S LICENSE	COURT STS	DATE
Michael Joe Jackson				511	120	BRN	BLK		B	01/16/04

mm