

STANISLAUS COUNTY SUPERIOR COURT

STATE OF CALIFORNIA

THE PEOPLE OF THE STATE OF CALIFORNIA,)
)
vs.)
)
MATTHEW DOUGLAS NICHOLSON)
(DOB: 04/27/1989))
(IN CUSTODY) Booking No. 1426456)
)
DEFENDANT)
)
No. 4006252)

COMPLAINT -- CRIMINAL

CPD 0218000212

State of California)
County of Stanislaus) ss.

ANNETTE REES, OF THE STANISLAUS COUNTY DISTRICT ATTORNEY'S OFFICE, complains and alleges, upon information and belief, that said defendant did commit the following crimes in the County of Stanislaus, State of California.

COUNT I: On or about January 11, 2018, defendant did commit a felony, MURDER, violation of Section 187(a) of the California Penal Code, in that the defendant did willfully, unlawfully, and feloniously and with malice aforethought murder LYDIA NICHOLSON, a human being.

ENHANCEMENT: It is further alleged that the defendant(s) acted intentionally, deliberately and with premeditation.

ENHANCEMENT: During the commission of the above charged offense, defendant personally and intentionally discharged a firearm and proximately caused great bodily injury or death to another person, to wit, LYDIA NICHOLSON, in violation of Section 12022.53(d) of the California Penal Code.

COUNT II: On or about January 11, 2018, defendant did commit a felony, THREATENING TO COMMIT A CRIME, violation of Section 422(a) of the California Penal Code, in that the defendant did willfully, unlawfully, and feloniously threaten to commit a crime which would result in the death of or great bodily injury to LOREN NICHOLSON, thereby causing him to reasonably be in sustained fear for his safety.

ENHANCEMENT: During the commission of the above said offense, defendant personally used a firearm, in violation of Section 12022.5(a) of the California Penal Code.

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NOTICE: It is further alleged, pursuant to Penal Code Section 1170(h)(3) and 1170(f) that the defendant, **MATTHEW DOUGLAS NICHOLSON**, is not eligible to be sentenced to a term of imprisonment in the county jail on an executed sentence. This allegation is not subject to dismissal pursuant to Penal Code Section 1385.

AR/dmr

All of which is contrary to law in such cases made and provided, and against the peace and dignity of the People of the State of California.

I certify under penalty of perjury, at Modesto, California, that the foregoing is true and correct.

Dated: _____

Complainant