

1 DA Case ID No. 21-4150  
2 In Custody 9/29/21 9:00 H  
3 C. DAVID EYSTER (SBN #113115) ns  
4 District Attorney  
5 Mendocino County  
6 Courthouse, Room G-10  
7 Post Office Box 1000  
8 Ukiah, CA 95482  
9 (707) 463-4211

10 Attorneys for Plaintiff

11 **SUPERIOR COURT OF CALIFORNIA**  
12 **COUNTY OF MENDOCINO**

13 THE PEOPLE OF THE STATE OF  
14 CALIFORNIA

15 Plaintiff,

16 v.

17 **COMPLAINT-CRIMINAL**  
18 **FELONY**

19 SHARON KATHLEEN SMITH,  
20 CHARLES DALE MAXFIELD JR.,

21 Defendants.

22 **THE UNDERSIGNED, ON INFORMATION AND BELIEF, COMPLAINS AND**  
23 **SAYS, THAT WITHIN THE COUNTY OF MENDOCINO, STATE OF CALIFORNIA**

24 **COUNT ONE**

25 Said defendants **SHARON KATHLEEN SMITH** and **CHARLES DALE MAXFIELD**  
26 **JR.** did on and between the 25th day of September 2021 and the 26th day of September  
27 2021, commit the crime of UNLAWFUL USE/TRANSFER OF PERSONAL IDENTIFYING  
28 INFORMATION, a FELONY violation of Section 530.5(c)(3) of the California Penal Code,  
in that said defendants did then and there with the intent to defraud, acquire or retain .

1 possession of the personal identifying information of 10 or more other persons, as defined  
2 in subdivision (b) of section 530.55 of another person.

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4 **COUNT TWO**

5 Said defendants **SHARON KATHLEEN SMITH** and **CHARLES DALE MAXFIELD**  
6 **JR.** did on and between the 10th day of September 2021 and the 26th day of September  
7 2021, commit the crime of CONSPIRACY TO COMMIT MAIL THEFT, a FELONY  
8 violation of Section 182(a)(1)/ 530.5(e) of the California Penal Code, in that said  
9 defendants did then and there willfully and unlawfully conspire together to commit the  
10 crime of Mail Theft in violation of Section 530.5(e) of the California Penal Code; and did  
11 willfully agree to take mail belonging to numerous victims, as defined in Section 1705 of  
12 Title 18 of the United States Code; and pursuant to and for the purpose of carrying out the  
13 objects and purposes of the aforesaid conspiracy, the said defendants committed the  
14 following overt act and acts at and in the County of Mendocino.

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16 **OVERT ACT NO. 1**

17 Between September 10, 2021 and September 26, 2021 the defendants did acquire  
18 a vehicle, a 2004 Ford Focus from James Gowan and did keep and use that vehicle to  
19 travel throughout Mendocino County and acquire mail belonging to numerous victims.  
20

21 **OVERT ACT NO. 2**

22 Prior to or on September 26, 2021 defendants did acquire and possess 2-way  
23 scanner/radios and cell phones that would assist in communications between them while  
24 traveling or walking to mail boxes acquiring mail.

25 **OVERT ACT NO. 3**

26  
27 Between September 10, 2021 and September 26, 2021 the defendants did acquire  
28 numerous items of mail and five personal identification cards of various individuals who

1 had not consented to providing this information with the intention of creating fraudulent  
2 identities and/or documents.

3 The offenses charged in the **TWO COUNTS** of this complaint were of the same  
4 class of crime or connected together in their commission.

5 Complainant therefore prays that said defendants be dealt with according to law.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Executed on September 28, 2021 in Ukiah, California.

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12   
13 ELIZABETH NORMAN  
14 Deputy District Attorney

15 Pursuant to Penal Code Section 1054.3, the prosecuting attorney hereby requests  
16 that the defendants and their attorney disclose the following:

17 “(a) The names and addresses of persons, other than the defendant, he or she  
18 intends to call as witnesses at the trial, together with any relevant written or recorded  
19 statements of those persons, or reports of the statements of those persons, including any  
20 reports of statements of experts made in connection with the case, and including the  
21 results of physical or mental examinations, scientific tests, experiments, or comparisons  
22 which the defendant intends to offer in evidence at the trial.”

23 “(b) Any real evidence which the defendant intends to offer in evidence at the trial.”  
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