

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

01 ISAAC JACOB GALVAN (DOB: 02/14/1987),
aka ISSAAC JACOB GALVAN,

02 JACE JONATHAN DAWSON (DOB: 03/30/1987),
aka JACE DAWSON,
aka JO NATHAN DAWSON,

03 KIMBERLY CHAOUCH (DOB: 11/20/1972),

04 TONI SANAE MORRIS (DOB: 03/10/1987),

05 BARRY KIRK REED (DOB: 08/21/1959),
aka RONALD PHILLIPS, and

06 REGINALD ORLANDO STREETER (DOB: 07/16/1970)

Defendant(s).

CASE NO. BA497713

**FELONY COMPLAINT
FOR ARREST WARRANT**

**DISTRICT ATTORNEY'S OFFICE
PUBLIC INTEGRITY DIVISION
211 WEST TEMPLE STREET, SUITE 1000
LOS ANGELES, CA 90012**

The undersigned is informed and believes that:

COUNT 1

On or between November 14, 2020 and April 20, 2021, in the County of Los Angeles, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by JACE DAWSON, KIMBERLY CHAOUCH, TONI MORRIS, BARRY REED and REGINALD STREETER, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Election Fraud, in violation of Section 18500 of the Election Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Los Angeles:

Overt Act One

On November 14, 2020, Dawson texted Morris a link to a post with the headline "Compton Preparing to move to an all-mail election in 2021," to which Morris replied two hours later: "Yeees!!!! Dr.Jace come for that seat baby!!!" Dawson replied five minutes later: "Yeeees absolutely!!!!"

Overt Act Two

Dawson ran for the District Two City Council seat in Compton, CA in the April 20, 2021 election.

Overt Act Three

At Dawson's behest, Chaouch registered at Dawson's apartment in Compton for the April Compton Nominating Election despite not living in Compton.

Overt Act Four

At Dawson's behest, Morris registered at Dawson's apartment in Compton for the April Compton Nominating Election despite not living in Compton.

Overt Act Five

At Dawson's behest, Reed registered at Dawson's apartment in Compton for the April Compton Nominating Election despite not living in Compton.

Overt Act Six

At Dawson's behest, Streeter registered at Dawson's apartment in Compton for the April Compton Nominating Election despite not living in Compton.

Overt Act Seven

At Dawson's behest, Chaouch voted in the April Compton Nominating Election despite not living in Compton.

Overt Act Eight

At Dawson's behest, Reed voted in the April Compton Nominating Election despite not living in Compton.

Overt Act Nine

At Dawson's behest, Streeter voted in the April Compton General Election despite not living in Compton.

* * * * *

COUNT 2

On or between April 20, 2021 and June 4, 2021, in the County of Los Angeles, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by ISAAC GALVAN, JACE DAWSON, KIMBERLY CHAOUCH, TONI MORRIS and REGINALD STREETER, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Election Fraud, in violation of Section 18500 of the Election Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Los Angeles:

Overt Act One

On April 27, 2021, following the April 20, 2021 election, Dawson had the following text exchange with Chaouch:

Dawson: "Still a three way tie we are behind by two votes but it's all good"

Chaouch: "Oh ok....did you talk to Galvin"

Dawson: "He requested me... But no conversations yet"

Chaouch: "Ok, that's cool I hope you both reach each other"

Overt Act Two

Dawson and Galvan had the following text exchange on May 8, 2021:

Galvan: "After the election maybe I can bring you on board to help me out"

Galvan: "There will be an opening"

Dawson: "I will definitely be open to that"

Galvan: "Let's grab a drink and chat about it"

Dawson: "Sounds good I'm down...."

Overt Act Three

Dawson and Galvan met for coffee on May 10, 2021.

Overt Act Four

Dawson and Galvan had the following text exchange on May 11, 2021:

Galvan: "Did good this morning"

Galvan: "Real solid:"

Dawson: "Niice same here I have the ballads but they didn't fill it out or sign it so I have to track them down to sign the ballot at least"

Galvan: "Alright being them over when we link"

Galvan: "Do you want to go over to the hall soon to get the application rolling for the position"

Dawson: "Okay gotcha"

Dawson: "Yes absolutely"

Overt Act Five

Dawson and Galvan had the following text exchange on May 12, 2021:

Galvan: "When are you gonna swing by"

Dawson: "I'm waiting for them to sign but I have the ballots"

Galvan: "Ok"

Overt Act Six

Dawson sent Galvan the following text on May 13, 2021:

Dawson: "OK so this weekend maybe I will have the ballot signed I still trying to get a hold of some people some ballots came and were left with no signature"

Overt Act Seven

Dawson and Galvan had the following text exchange on May 17, 2021:

Galvan: "Bring me the ballots man"

Galvan: "Let's do this"

Dawson: "You got it!!!!!!"

Dawson: "Yes got another one signed today"

Overt Act Eight

Galvan sent Dawson the following text on May 21, 2021:

Galvan: "Are you home? I want to drop off some ballots and I'm picking up some more tomorrow"

Overt Act Nine

Galvan texted Dawson on May 22, 2021 a link to the May 25, 2021 Compton City Council meeting agenda with a follow up text "Item 4," referencing Item 4 on the agenda, which was an unnamed city commission appointment.

Overt Act Ten

Galvan appointed Dawson to a city liaison position at the May 25, 2021 Compton City Council meeting, when Item 4 was called. Then-Mayor Aja Brown voted against the appointment, calling it "laughable," as the appointment was approved by a 3-to-1 vote, with Galvan voting in favor.

Overt Act Eleven

As the May 25, 2021 Compton City Council meeting was in progress, at 11:22 p.m., Galvan and Dawson had the following text exchange:

Galvan: "You see what I got to deal with. Hope your sticking and pushing me"
Dawson: "Bet your ass I'm sticking and pushing you through"

Overt Act Twelve

Dawson and Galvan had the following text exchange on May 23, 2021:

Dawson: "We got 4 more ballots today"
Galvan: "You the man"

Overt Act Thirteen

Dawson met Galvan at Compton City Hall on May 23, 2021.

Overt Act Fourteen

Galvan texted Dawson "703 total ballots turned in for d2" on May 25, 2021.

Overt Act Fifteen

Dawson and Galvan had the following text exchange on May 26, 2021:

Galvan: "I may need your help this morning for 2 hours of your schedule permits"

Galvan: "I can call you in an hour to elaborate"

Dawson: "Copy that"

Dawson: "Got more people to vote"

Dawson: "Also another Ballot.. need three more lost Ballot forms"

[...]

Dawson: "Just tracked down my neighbor who moved going to take her this paper that's another Ballot. So I only have one empty sheet left"

Overt Act Sixteen

On May 28, 2021, Dawson sent to Galvan via text message a Long Beach address of a woman who was "registered in Compton still" and "needs a paper ballot."

Overt Act Seventeen

Despite not living in Compton, Chaouch voted in the June Compton General Election, indicating she lived at Dawson's Compton address.

Overt Act Eighteen

Despite not living in Compton, Morris voted in the June Compton General Election, indicating she lived at Dawson's Compton address.

Overt Act Nineteen

Despite not living in Compton, Streeter voted in the June Compton General Election, indicating he lived at Dawson's Compton address.

Overt Act Twenty

On June 4, 2021, Galvan went to the registrar to observe the ballot counting and offered a registrar employee a bribe, in an attempt to fraudulently influence the results of the election.

* * * * *

COUNT 3

On or near June 4, 2021, in the County of Los Angeles, the crime of ATTEMPTED BRIBERY AT ELECTION, in violation of PENAL CODE SECTION 664(a) / ELECTION CODE SECTION 18523, a Felony, was committed by ISAAC GALVAN, who did attempt to pay ELVA GOMEZ a valuable thing, to wit, BANDA MS CONCERT TICKETS, unlawfully and with intent that any part shall be used in bribery at any election.

* * * * *

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR.

NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.

NOTICE: Conviction of this offense prohibits you from owning, purchasing, receiving, possessing, or having under your custody and control any firearms, and effective January 1, 2018, will require you to complete a Prohibited Persons Relinquishment Form ("PPR") pursuant to Penal Code § 29810.

Further, attached hereto and incorporated herein are official reports and documents of a law enforcement agency which the undersigned believes establish probable cause for the arrest of defendant(s) ISAAC JACOB GALVAN, JACE JONATHAN DAWSON, KIMBERLY CHAOUCH, TONI SANA MORRIS, BARRY KIRK REED, REGINALD ORLANDO STREETER for the above-listed crimes. Wherefore, a warrant of arrest is requested for ISAAC JACOB GALVAN, JACE JONATHAN DAWSON, KIMBERLY CHAOUCH, TONI SANA MORRIS, BARRY KIRK REED, REGINALD ORLANDO STREETER.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER BA497713, CONSISTS OF 3 COUNT(S).

Executed at LOS ANGELES, County of Los Angeles, on August 13, 2021.


ARTHUR CHOI
DECLARANT AND COMPLAINANT

.....
GEORGE GASCÓN, DISTRICT ATTORNEY

BY: 
RICHARD DREILING, DEPUTY

AGENCY: LACO D.A.
BUREAU OF
INVESTIGATION

I/O: EMILY LADINO

ID NO.: 643407 PHONE :

DR NO.: P210230

OPERATOR: CB

PRELIM. TIME EST.: 2 DAY(S)

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
GALVAN, ISAAC JACOB		2/14/1987		\$1	
DAWSON, JACE JONATHAN		3/30/1987		\$1	
CHAOUCH, KIMBERLY		11/20/1972		\$1	
MORRIS, TONI SANA MORRIS		3/10/1987		\$1	
REED, BARRY KIRK		8/21/1959		\$1	
STREETER, REGINALD ORLANDO		7/16/1970		\$1	

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendant(s), the warrant is so ordered.

ISAAC GALVAN

BAIL: \$ 40,000

JACE DAWSON

BAIL: \$ 40,000

KIMBERLY CHAOUCH

BAIL: \$ 40,000

TONI MORRIS

BAIL: \$ 40,000

BARRY REED

BAIL: \$ 40,000

REGINALD STREETER

BAIL: \$ 40,000

DATE: 8/12/21



VICTORIA B. WILSON

Victoria B. Wilson
Judge of the Above Entitled Court

NON-WARRANT DEFENDANTS:

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
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FELONY COMPLAINT -- ORDER HOLDING TO ANSWER -- P.C. SECTION 872

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendant(s) guilty thereof, to wit:

(Strike out or add as applicable)

ISAAC JACOB GALVAN

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
2	PC 182(a)(1)	Check Code County Jail		
3	PC 664			

JACE JONATHAN DAWSON

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail		
2	PC 182(a)(1)	Check Code County Jail		

KIMBERLY CHAOUCH

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail		
2	PC 182(a)(1)	Check Code County Jail		

TONI SANA MORRIS

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail		
2	PC 182(a)(1)	Check Code County Jail		

BARRY KIRK REED

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail		

REGINALD ORLANDO STREETER

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail		
2	PC 182(a)(1)	Check Code County Jail		

I order that the defendant(s) be held to answer therefore and be admitted to bail in the sum of:

ISAAC JACOB GALVAN	_____ Dollars
JACE JONATHAN DAWSON	_____ Dollars
KIMBERLY CHAOUCH	_____ Dollars
TONI SANAE MORRIS	_____ Dollars
BARRY KIRK REED	_____ Dollars
REGINALD ORLANDO STREETER	_____ Dollars

and be committed to the custody of the Sheriff of Los Angeles County until such bail is given. Date of arraignment in Superior Court will be:

ISAAC JACOB GALVAN	_____ in Dept _____
JACE JONATHAN DAWSON	_____ in Dept _____
KIMBERLY CHAOUCH	_____ in Dept _____
TONI SANAE MORRIS	_____ in Dept _____
BARRY KIRK REED	_____ in Dept _____
REGINALD ORLANDO STREETER	_____ in Dept _____

at: _____ A.M.

Date: _____

Committing Magistrate