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2 DISTRICT ATTORNEY
3 STATE BAR # 237986
4 COUNTY OF SAN LUIS OBISPO
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DV Case
 BOOKING REQ

8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF SAN LUIS OBISPO

10
11 THE PEOPLE OF THE STATE OF CALIFORNIA

COURT CASE NO. 26F-03635

12 Plaintiff,

COMPLAINT

13 vs.

14 **MICHAEL JOSEPH STEELE**

DA CASE NO. 079-725793

15 DOB: 03/30/1988

16 ID NO. D000171312

CII: A27798223

AKA MICHAEL JOSEPEHPH STEELE

17 Defendant.

Appearance Date:

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20 The District Attorney of San Luis Obispo County, California, hereby accuses the
21 above named defendant of the following criminal offenses:

22 Count 1

23 On or about or between June 22, 2025 and July 5, 2025, in the County of San Luis Obispo,
24 State of California, the crime of Child Abuse in violation of PC273a(a), a Felony, was
25 committed in that MICHAEL JOSEPH STEELE did willfully and unlawfully, under
26 circumstances likely to produce great bodily harm or death, did willfully cause or permit a
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1 child, Confidential Victim, to be placed in such situation that his/her person and health
2 was/were endangered.

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4 Count 2

5 On or about or between June 22, 2025 and July 5, 2025, in the County of San Luis Obispo,
6 State of California, the crime of Possession Of The Ingredients To Make A Destructive
7 Device in violation of PC18720, a Felony, was committed in that MICHAEL JOSEPH
8 STEELE did unlawfully possess a substance or material, or a combination of substances
9 and materials, with the intent to make a destructive device or explosive without a valid
10 permit so to do. It is further alleged that, pursuant to Penal Code Section 18780, imposition
11 of sentence cannot be suspended or probation granted.

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13 Count 3

14 On or about or between June 22, 2025 and July 5, 2025, in the County of San Luis Obispo,
15 State of California, the crime of Conspiracy To Commit A Crime in violation of PC182(a)(1),
16 a Felony, was committed in that MICHAEL JOSEPH STEELE did unlawfully conspire
17 together and with another person and persons whose identity is known or unknown to
18 commit the crime of possessed a gross weight of less than 25 pounds of unaltered
19 dangerous fireworks, in violation of Section 12700(b)(1) of the Health and Safety Code
20 Code, a felony; that pursuant to and for the purpose of carrying out the objectives and
21 purposes of the aforesaid conspiracy, the said defendants committed the following overt
22 acts, at least one of which occurred in the County of San Luis Obispo:

- 23 1. Conspirators travel together from San Luis Obispo County to Bakersfield.
24 2. Conspirators purchase illegal fireworks in Bakersfield
25 3. Conspirators return together from Bakersfield to San Luis Obispo County.
26 4. Conspirator posts on social media about purchase of illegal fireworks.

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Count 4

On or about or between June 22, 2025 and July 5, 2025, in the County of San Luis Obispo, State of California, the crime of Violation Of Fireworks And Pyrotechnics Devices Health And Safety Code, Part 2 in violation of HS12700(b)(1), a Misdemeanor, was committed in that MICHAEL JOSEPH STEELE did violate a provision of Part 2 of the Health and Safety Code relating to Fireworks and Pyrotechnics and possessed a gross weight of less than 25 pounds of unaltered dangerous fireworks.

Count 5

On or about or between June 22, 2025 and July 5, 2025, in the County of San Luis Obispo, State of California, the crime of Possess Dangerous Fireworks in violation of HS12677, a Misdemeanor, was committed in that MICHAEL JOSEPH STEELE did, without holding a valid permit, willfully and unlawfully possess a dangerous firework as defined in Health and Safety Code Section 12505.

Count 6

On or about or between June 22, 2025 and July 5, 2025, in the County of San Luis Obispo, State of California, the crime of Possess And Store Unregistered Fireworks in violation of HS12671, a Misdemeanor, was committed in that MICHAEL JOSEPH STEELE did willfully and unlawfully use, discharge, possess, store or transport fireworks within this state which such fireworks had not been classified and registered by the State Fire Marshall.

It is further alleged pursuant to Penal Code Section 1170(b)(2) that one or more of the following factors in aggravation listed in California Rule of Court 4.421 may apply to the defendant(s) or to conduct of the defendant(s):

4.421(a)(1) The crime involved great violence, great bodily harm, threat of great bodily harm, and other acts disclosing a high degree of cruelty, viciousness and callousness.

- 1 4.421(a)(2) The defendant was armed with or used a weapon at the time of the
2 commission of the crime.
- 3 4.421(a)(3) The victim was particularly vulnerable.
- 4 4.421(a)(4) The defendant induced others to participate in the commission of the crime
5 and occupied a position of leadership and dominance of other participants in its
6 commission.
- 7 4.421(a)(5) The defendant induced a minor to commit or assist in the commission of the
8 crime.
- 9 4.421(a)(6) The defendant threatened witnesses, unlawfully prevented and dissuaded
10 witnesses from testifying, suborned perjury, and in any other way illegally interfered with
11 the judicial process.
- 12 4.421(a)(7) The defendant is charged with other crimes for which consecutive sentences
13 can be imposed but for which concurrent sentences shall be imposed.
- 14 4.421(a)(8) The manner in which the crime was carried out indicates planning,
15 sophistication, or professionalism.
- 16 4.421(a)(9) The crime involved an attempted or actual taking or damage of great monetary
17 value.
- 18 4.421(a)(10) The crime involved a large quantity of contraband.
- 19 4.421(a)(11) The defendant took advantage of a position of trust and confidence to commit
20 the offense.
- 21 4.421(a)(12) The crime constitutes a hate crime under section 422.55 of the Penal Code
22 and no hate crime enhancements under section 422.75 of the Penal Code shall be
23 imposed and the crime is not subject to sentencing under section 1170.8 of the Penal
24 Code.
- 25 4.421(b)(1) The defendant has engaged in violent conduct that indicates a serious danger
26 to society.
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1 4.421(b)(2) The defendant's prior convictions as an adult and sustained petitions in
2 juvenile delinquency proceedings are numerous and of increasing seriousness.

3 4.421(b)(3) The defendant has served a prior term in prison and county jail under section
4 1170(h).

5 4.421(b)(4) The defendant was on probation, mandatory supervision, post release
6 community supervision, and parole when the crime was committed.

7 4.421(b)(5) The defendant's prior performance on probation, mandatory supervision, post
8 release community supervision, and parole was unsatisfactory.

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

3 I declare that an investigation has been conducted to determine if said Defendant(s)
4 did commit the stated crime, which reports are attached hereto and incorporated herein by
5 reference, and that the facts therein show probable cause that the said Defendant(s) did
6 commit the crime. Your declarant requests the issuance of a Warrant of Arrest either if
7 said Defendant(s) do not appear voluntarily in response to an appearance letter, or if no
8 appearance letter was issued.

9 **Discovery Request:** Pursuant to Penal Code Section 1054.5(b), the People are
10 hereby informally requesting that defense counsel provide discovery to the people as
11 required by Penal Code Section 1054.3.

12 On this day May 17, 2026, in the County of San Luis Obispo, I certify and declare
13 under penalty of perjury that the foregoing is true and correct.

14 Dated: May 17, 2026

15 DAN DOW
16 DISTRICT ATTORNEY

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18 By: _____
19 SARAH MERSON
20 DEPUTY DISTRICT ATTORNEY

21 Upon review of the reports attached and incorporated herein by reference, I find sufficient
22 probable cause to warrant the defendant(s) continued detention.

23 Dated: _____
24 Judge of the Superior Court

SUMMARY PAGE

Count	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC273a(a)		Michael Joseph Steele		
2	PC18720		Michael Joseph Steele		
3	PC182(a)(1)		Michael Joseph Steele		
4	HS12700(b)(1)		Michael Joseph Steele		
5	HS12677		Michael Joseph Steele		
6	HS12671		Michael Joseph Steele		