1	MICHAEL A. HESTRIN B	SAIL: DEF 1: \$50,000.00	
2	District Attorney	DEF 2: \$35,000.00	
3	County of Riverside		
4	30755-D Auld Road, 3rd Floor	FILED	
5	Murrieta, CA 92563	SUPERIOR COURT OF CALIFORNIA 7	
6	Telephone:(951) 304-5400	NOV 2 0 2023	
7	Elaina G. Bentley	Λ -	
8	Assistant District Attorney	R. Gonzalez	
9	State Bar No. 133451	V V-1)	
10		• / ()	
11	SUPERIOR COURT OF CALIFORNIA		
12	COUNTY OF RIVERSIDE		
13	(Southwest)		
14		7,00	
15	THE PEOPLE OF THE STATE OF CALIFORNIA,	NO. SWF2307099	
16			
17	Plaintiff,	*	
18	v.		
19			
20	MICHELLE LOUIGE MODDIG WEDDI	INDIGTNENT	
21	MICHELLE LOUISE MORRIS-KERIN	INDICTMENT	
22	AKA: MICHELLE LOUISE KERIN		
23	AKA: MICHELLE LOUISE LAYTON		
24 25	AKA: MICHELLE MORRIS KERRIN		
26	AKA: MICHELLE LOUISE RANDAU		
27	AKA: MICHELLE LOUISE WATT		
28	EDWARD LAWRENCE KERIN	AGENCY#: F190960006/RSDF	
29	AKA: LARRY KERIN	AGENC 1#. F190900000/RSDF	
30	Defendants.		
31	Defendants.		
32	COUNT 1		
33	The Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses		
34	MICHELLE LOUISE MORRIS-KERIN of a violation of Penal Code section 187, subdivision (a),		
35	felony, in that on or about 4/6/2019, in the County of Riverside, State of California, the defendant		
36	did willfully and unlawfully murder JANE DOE (D.R.), a human being. [25-L/L/D]		

MICHAEL A. HESTRIN
DISTRICT ATTORNEY
County of Riverside
State of California

COUNT 2

For a further and separate cause of action, being a different offense from but connected in its commission with the charge set forth in count 1 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN and EDWARD LAWRENCE KERIN of a violation of Penal Code section 192, subdivision (b), a felony, in that on or about 4/6/2019, in the County of Riverside, State of California, the defendant did willfully and unlawfully kill a human being, to wit, JANE DOE (D.R.), in the commission of an unlawful act, not amounting to a felony, and in the commission of a lawful act which might produce death, in an unlawful manner and without due caution and circumspection. [2/3/4]

COUNT 3

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 and 2 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN and EDWARD LAWRENCE KERIN of a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 4/6/2019, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE (D.R.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did willfully cause and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such a situation that their person and health was endangered. [2/4/6 prison]

COUNT 4

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 3 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN and EDWARD LAWRENCE KERIN of a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 8/10/2018, through and including 4/6/2019, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE (D.R.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did willfully cause and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such a situation that their person and health was endangered. [2/4/6 prison]

COUNT 5

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 4 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN and EDWARD LAWRENCE KERIN of a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 8/10/2018, through and including 4/6/2019, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE (N.M.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did willfully cause and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such a situation that their person and health was endangered. [2/4/6 prison]

COUNT 6

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 5 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN of a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 8/10/2018, through and including 4/6/2019, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JOHN DOE (C.M.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did willfully cause and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such a situation that their person and health was endangered. [2/4/6 prison]

COUNT 7

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 6 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN of a violation of Penal Code section 273a, subdivision (a), a felony, in that on or about 8/10/2018, through and including 4/6/2019, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit a child, JANE DOE (T.N.), to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and, having the care and custody of said child, did willfully cause and permit the person and health of said child to be injured and did

willfully cause and permit said child to be placed in such a situation that their person and health was endangered. [2/4/6 prison]

COUNT 8

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 7 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN of a violation of Penal Code section 368, subdivision (b)(1), a felony, in that on or about 8/10/2016, through and including 4/6/2019, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JANE DOE (CO. H.), with knowledge that they were an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did willfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered. [2/3/4 prison]

COUNT 9

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 8 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN of a violation of Penal Code section 368, subdivision (b)(1), a felony, in that on or about 8/10/2016, through and including 4/6/2019, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JANE DOE (JE. M.), with knowledge that they were an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did willfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered. [2/3/4 prison]

COUNT 10

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 9 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN and EDWARD LAWRENCE KERIN of a violation of Penal Code section 368, subdivision (b)(1), a felony, in that on or about 8/10/2016, through and including 4/6/2019, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under

circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JANE DOE (K.M.), with knowledge that they were an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did willfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered. [2/3/4 prison]

COUNT 11

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 10 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN and EDWARD LAWRENCE KERIN of a violation of Penal Code section 368, subdivision (b)(1), a felony, in that on or about 8/10/2016, through and including 4/6/2019, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JOHN DOE (W.H.), with knowledge that they were an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did willfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered. [2/3/4 prison]

COUNT 12

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 11 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN and EDWARD LAWRENCE KERIN of a violation of Penal Code section 368, subdivision (b)(1), a felony, in that on or about 8/10/2016, through and including 4/6/2019, in the County of Riverside, State of California, the defendant did willfully and unlawfully, under circumstances and conditions likely to produce great bodily harm and death, cause and permit an elder and dependent adult, to wit: JANE DOE (VI.M.), with knowledge that they were an elder and dependent adult, to suffer, and inflicted thereon unjustifiable physical pain and mental suffering, and having care and custody thereof did willfully cause and permit the person and health of the elder and dependent adult to be injured and placed in a situation where such person and health were endangered. [2/3/4 prison]

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COUNT 13

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 12 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN and EDWARD LAWRENCE KERIN of a violation of Penal Code section 288, subdivision (c)(2), a felony, in that on or about 8/10/2011, through and including 4/4/2017, in the County of Riverside, State of California, the defendant, being a caretaker, did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of JANE DOE (K.M.), a dependent person, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said dependent person. [3/6/8 prison]

COUNT 14

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 13 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN and EDWARD LAWRENCE KERIN of a violation of Penal Code section 288, subdivision (c)(2), a felony, in that on or about 8/10/2011, through and including 4/4/2017, in the County of Riverside, State of California, the defendant, being a caretaker, 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 (E.M.), a dependent person, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said dependent person. [3/6/8 prison]

COUNT 15

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 14 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses MICHELLE LOUISE MORRIS-KERIN of a violation of Penal Code section 288, subdivision (c)(2), a felony, in that on or about 1/10/2012 through and including 9/30/14, in the County of Riverside, State of California, the defendant, being a caretaker, 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 (R.M.), a dependent person, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said dependent person. [3/6/8 prison]

DATE: November 20, 2023

MICHAEL A. HESTRIN

District Attorney

CBELL

CHRIS S. BOUFFARD

Managing Deputy District Attorney

for

ELAINA BENTLEY

Assistant District Attorney

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35. Michelle Carrillo

36. Michelle Clarke

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37	Salls	y Hogan
51.	Sally	y nogan

- 38. Sandra Longnecker
- 39. Sarah Roberts
- 40. Scott Modell
- 41. Sean Spicer
- 42. Sharday Williams
- 43. Sharon Slaughter 44. Tiffany McMillon
- 45. Victoria Bauer
- 46. Wilfredo Vasquez

A TRUE BILL:

Foreperson of the Criminal Grand Jury

State of California

1	MICHAEL A. HESTRIN		
2	District Attorney		
3	County of Riverside		
4	30755-D Auld Road, 3rd Floor		
5	Murrieta, CA 92563		
6	Telephone: (951) 304-5400		
7	Elaina G. Bentley		
8	Assistant District Attorney		
9	State Bar No. 133451		
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12			
13	SUPERIOR COURT OF CALIFORNIA		
14	COUNTY OF RIVERSIDE		
15	(Southwest)		
16			
17	THE PEOPLE OF THE STATE OF CALIFORNIA,	Case No.	
18	Plaintiff,		
19	v.		
20	MICHELLE LOUISE MORRIS	REQUEST/MOTION FOR	
21	AKA: MICHELLE LOUISE KERIN	PROSECUTION DISCOVERY	
22	AKA: MICHELLE LOUISE LAYTON	(Pen. Code, §§ 1054.3,	
23	AKA: MICHELLE L MORRIS KERRIN	1054.5(a) & (b))	
24	AKA: MICHELLE LOUISE RANDAU		
25	AKA: MICHELLE LOUISE WATT		
26			
27	EDWARD LAWRENCE KERIN		
28	AKA: LARRY KERIN		
29	Defendants.		
30			
31	TO: THE HONORABLE JUDGE OF THE SUPERIOR COURTS AND TO COUNSEL		
32	FOR ABOVE-NAMED DEFENDANTS:		
33	PLEASE BE INFORMED that the Office of the District Attorney of Riverside County,		
34	acting on behalf of the Plaintiff, the People of the State of California, hereby requests/moves for		
35	discovery/disclosure of the following items from the defendants and counsels in this case,		
36	pursuant to Penal Code section 1054.3(a) and (b):		

MICHAEL A. HESTRIN
DISTRICT ATTORNEY
County of Riverside
State of California

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- 1. The names and addresses of persons, other than the defendants, counsels or defendant intends to call as witnesses at trial;
- 2. Any relevant written or recorded statements of the persons in No. 1 above and/or reports of the statement of such persons;
- 3. Any reports or statement of experts made in connection with this case, including, but not limited to, the results of physical or mental examinations, scientific tests, experiments, or comparisons which the defendant or counsel intend to offer as evidence at the trial of this case; and
- 4. Any "real," i.e., tangible or physical, evidence which the defendant or counsel intends to offer in evidence at the trial.

PLEASE TAKE NOTE that pursuant to the provisions of Penal Code section 1054.5(b) if the above material and information requested is not provided to counsel for the plaintiff within 15 days of this request, a court order will be sought to promptly enforce the provisions of Penal Code section 1054.3.

Dated: November 20, 2023

Respectfully submitted,

MICHAEL A. HESTRIN District Attorney

ELAINA BENTLEY
Assistant District Attorney

County of Riverside

State of California