

1 DAN DOW
DISTRICT ATTORNEY
2 STATE BAR # 237986
COUNTY OF SAN LUIS OBISPO
3 COURTHOUSE ANNEX, 4TH FLOOR
SAN LUIS OBISPO, CA 93408
4 TELEPHONE: (805) 781-5800

**ELECTRONICALLY
FILED
5/17/2021 11:43 AM**
SAN LUIS OBISPO SUPERIOR COURT
By: C. Perez,
Deputy Clerk

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8 SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO
9 DEPARTMENT

10
11 THE PEOPLE OF THE STATE OF
CALIFORNIA

Plaintiff,

12
13 vs.

14 **SHAWN MATTHEW LUHM**
DOB: 03/04/1983 ID NO. D000445997

15
16 **KAYLA ANNE LUHM**
17 DOB: 06/21/1989 ID NO. D000445998

18
19 **MELISSA DAWN CURRIE**
20 DOB: 10/11/1984 ID NO. D000219183

21
22 Defendants.

COURT CASE NO. 21F-03079-A
AMENDED COMPLAINT

DA CASE NO. 079-664043

DA CASE NO. 079-664060
COURT CASE NO. 21F-03079-B

DA CASE NO. 079-664059
COURT CASE NO. 21F-03079-C

23
24 Appearance Date:

25 The District Attorney of the San Luis Obispo County, California, hereby accuses the
26 above named defendants of the following criminal offenses:
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Count 1

On or about February 4, 2021, in the County of San Luis Obispo, State of California, the crime of Child Abuse in violation of PC 273a(a), a felony, was committed in that SHAWN MATTHEW LUHM and KAYLA ANNE LUHM did willfully and unlawfully, under circumstances likely to produce great bodily harm and/or death, injure, cause, or permit a child, baby LILITH L., to suffer or to be inflicted with unjustifiable physical harm, and, having the care and custody of LILITH L., SHAWN MATTHEW LUHM and KAYLA ANNE LUHM did willfully cause or permit LILITH L. to be placed in such situation where her person/health was endangered through exposure to fentanyl and methamphetamine.

Count 2

On or about February 8, 2021, in the County of San Luis Obispo, State of California, the crime of Accessory After The Fact in violation of PC 32, a felony, was committed in that that MELISSA DAWN CURRIE unlawfully, having knowledge that the crime of felony Child Abuse, in violation of section 273a(a) of the Penal Code of the State of California, had been committed by SHAWN MATTHEW LUHM and KAYLA ANNE LUHM, did aid SHAWN MATTHEW LUHM and/or KAYLA ANNE LUHM with the intent that the LUHMS might avoid or escape from arrest, trial, conviction, or punishment for said felony.

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, 2021, 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, 2021

15 DAN DOW
16 DISTRICT ATTORNEY

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19 By: 
20 LINDSEY A BITTNER
21 DEPUTY DISTRICT ATTORNEY

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

24 Dated: _____
25 _____
26 Judge of the Superior Court

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SUMMARY PAGE

Cnt	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC273a(a)		Shawn Matthew Luhm and Kayla Anne Luhm		
2	PC32		Melissa Dawn Currie		