

**FILED**

**SEP 02 2020**

SAN LUIS OBISPO SUPERIOR COURT  
BY M. Trujillo MT  
M. Trujillo, Deputy Clerk

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

8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF SAN LUIS OBISPO  
10 DEPARTMENT 10

11 THE PEOPLE OF THE STATE OF  
12 CALIFORNIA

Plaintiff,

13 vs.

14 CHRIS LYNN BERDOLL  
15 DOB: 11/17/1969 ID NO. D000431877

16 Defendant.

COURT CASE NO. 18F-08854

AMENDED INFORMATION

17 DA CASE NO. 079-630947

18 Appearance Date: September 15, 2020

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

21 Count 1

22 On or about August 27, 2018, in the County of San Luis Obispo, State of California, the  
23 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
24 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
25 which the defendant should reasonably have known that [REDACTED]  
26 was a minor under 18 years, promote, employ, use persuade, induce and coerce the minor  
27 to engage in and assist others to engage in: posing and modeling alone and with others  
28 for purposes of preparing a film, photograph, negative and slide. To wit the first video.

1 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
2 section 290. Willful failure to register is a crime.

3  
4 Count 2

5 On or about August 28, 2018, in the County of San Luis Obispo, State of California, the  
6 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
7 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
8 which the defendant and [REDACTED] [REDACTED] [REDACTED] should reasonably have known  
9 that [REDACTED] [REDACTED] [REDACTED] ) was a minor under 18 years, promote, employ, use  
10 persuade, induce and coerce the minor to engage in and assist others to engage  
11 in: posing and modeling alone and with others for purposes of preparing a film,  
12 photograph, negative and slide. To wit the last video.

13 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
14 section 290. Willful failure to register is a crime.

15  
16 Count 3

17 On or about August 16, 2018, in the County of San Luis Obispo, State of California, the  
18 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
19 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
20 which the defendant should reasonably have known that [REDACTED] [REDACTED] [REDACTED]  
21 was a minor under 18 years, promote, employ, use persuade, induce and coerce the minor  
22 to engage in and assist others to engage in: posing and modeling alone and with others  
23 for purposes of preparing a film, photograph, negative and slide. To wit the first video

24 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
25 section 290. Willful failure to register is a crime.

26  
27 Count 4

1 On or about August 22, 2018, in the County of San Luis Obispo, State of California, the  
2 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
3 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
4 which the defendant should reasonably have known that [REDACTED] [REDACTED] [REDACTED]  
5 was a minor under 18 years, promote, employ, use persuade, induce and coerce the minor  
6 to engage in and assist others to engage in: posing and modeling alone and with others  
7 for purposes of preparing a film, photograph, negative and slide. To wit the last video.  
8 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
9 section 290. Willful failure to register is a crime.

10  
11 Count 5

12 On or about August 16, 2018, in the County of San Luis Obispo, State of California, the  
13 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
14 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
15 which the defendant should reasonably have known that [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
16 was a minor under 18 years, promote, employ, use persuade, induce and coerce the minor  
17 to engage in and assist others to engage in: posing and modeling alone and with others  
18 for purposes of preparing a film, photograph, negative and slide. To wit the first video.  
19 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
20 section 290. Willful failure to register is a crime.

21  
22 Count 6

23 On or about August 16, 2018, in the County of San Luis Obispo, State of California, the  
24 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
25 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
26 which the defendant should reasonably have known that [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
27 was a minor under 18 years, promote, employ, use persuade, induce and coerce the minor  
28

1 to engage in and assist others to engage in: posing and modeling alone and with others  
2 for purposes of preparing a film, photograph, negative and slide. To wit the last video.  
3 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
4 section 290. Willful failure to register is a crime.

5

6

Count 7

7 On or about May 29, 2018, in the County of San Luis Obispo, State of California, the crime  
8 of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in that  
9 CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of which  
10 the defendant should reasonably have known that ( [REDACTED] [REDACTED] [REDACTED] [REDACTED] ) was a  
11 minor under 18 years, promote, employ, use persuade, induce and coerce the minor to  
12 engage in and assist others to engage in: posing and modeling alone and with others for  
13 purposes of preparing a film, photograph, negative and slide. To wit the first video.

14 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
15 section 290. Willful failure to register is a crime.

16

17

Count 8

18 On or about June 1, 2018, in the County of San Luis Obispo, State of California, the crime  
19 of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in that  
20 CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of which  
21 the defendant should reasonably have known that ( [REDACTED] [REDACTED] [REDACTED] [REDACTED] ) was a  
22 minor under 18 years, promote, employ, use persuade, induce and coerce the minor to  
23 engage in and assist others to engage in: posing and modeling alone and with others for  
24 purposes of preparing a film, photograph, negative and slide. To wit the last video.

25 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
26 section 290. Willful failure to register is a crime.

27

28

Count 9

1 On or about March 16, 2017, in the County of San Luis Obispo, State of California, the  
2 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
3 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
4 which the defendant should reasonably have known that [REDACTED] ) was a  
5 minor under 18 years, promote, employ, use persuade, induce and coerce the minor to  
6 engage in and assist others to engage in: posing and modeling alone and with others for  
7 purposes of preparing a film, photograph, negative and slide. To wit the first video.

8 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
9 section 290. Willful failure to register is a crime.

10  
11 Count 10

12 On or about April 27, 2018, in the County of San Luis Obispo, State of California, the crime  
13 of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in that  
14 CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of which  
15 the defendant should reasonably have known that [REDACTED] ) was a minor  
16 under 18 years, promote, employ, use persuade, induce and coerce the minor to engage  
17 in and assist others to engage in: posing and modeling alone and with others for purposes  
18 of preparing a film, photograph, negative and slide. To wit the last video.

19 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
20 section 290. Willful failure to register is a crime.

21  
22 Count 11

23 On or about October 16, 2017, in the County of San Luis Obispo, State of California, the  
24 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
25 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
26 which the defendant should reasonably have known that [REDACTED]  
27 was a minor under 18 years, promote, employ, use persuade, induce and coerce the minor  
28

1 to engage in and assist others to engage in: posing and modeling alone and with others  
2 for purposes of preparing a film, photograph, negative and slide. To wit the first video.  
3 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
4 section 290. Willful failure to register is a crime.

5  
6 Count 12

7 On or about October 16, 2017, in the County of San Luis Obispo, State of California, the  
8 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
9 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
10 which the defendant should reasonably have known that [REDACTED] )  
11 was a minor under 18 years, promote, employ, use persuade, induce and coerce the minor  
12 to engage in and assist others to engage in: posing and modeling alone and with others  
13 for purposes of preparing a film, photograph, negative and slide. To wit the last video.  
14 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
15 section 290. Willful failure to register is a crime.

16  
17 Count 13

18 On or between October 27, 2017 and April 20, 2018, in the County of San Luis Obispo,  
19 State of California, the crime of Using Minor For Sex Acts in violation of PC311.4(c), a  
20 Felony, was committed in that CHRIS LYNN BERDOLL did unlawfully and in possession of  
21 facts on the basis of which the defendant should reasonably have known that [REDACTED]  
22 [REDACTED] was a minor under 18 years, promote, employ, use persuade, induce and  
23 coerce the minor to engage in and assist others to engage in: posing and modeling alone  
24 and with others for purposes of preparing a film, photograph, negative and slide.  
25 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
26 section 290. Willful failure to register is a crime.

27  
28 Count 14  
PAGE - 6 -



1 On or about November 19, 2017, in the County of San Luis Obispo, State of California, the  
2 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
3 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
4 which the defendant should reasonably have known that [REDACTED] [REDACTED] was a  
5 minor under 18 years, promote, employ, use persuade, induce and coerce the minor to  
6 engage in and assist others to engage in: posing and modeling alone and with others for  
7 purposes of preparing a film, photograph, negative and slide. To wit the first video.

8 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
9 section 290. Willful failure to register is a crime.

10  
11 Count 15

12 On or about May 4, 2017, in the County of San Luis Obispo, State of California, the crime  
13 of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in that  
14 CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of which  
15 the defendant should reasonably have known that [REDACTED] [REDACTED] ) was a minor  
16 under 18 years, promote, employ, use persuade, induce and coerce the minor to engage  
17 in and assist others to engage in: posing and modeling alone and with others for purposes  
18 of preparing a film, photograph, negative and slide. To wit the last video.

19 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
20 section 290. Willful failure to register is a crime.

21  
22 Count 16

23 On or about April 20, 2018, in the County of San Luis Obispo, State of California, the crime  
24 of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in that  
25 CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of which  
26 the defendant should reasonably have known that [REDACTED] (00/00/0000) was a minor  
27 under 18 years, promote, employ, use persuade, induce and coerce the minor to engage  
28

1 in and assist others to engage in: posing and modeling alone and with others for purposes  
2 of preparing a film, photograph, negative and slide. To wit the fist video.

3 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
4 section 290. Willful failure to register is a crime.

5  
6 Count 17

7 On or about April 20, 2018, in the County of San Luis Obispo, State of California, the crime  
8 of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in that  
9 CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of which  
10 the defendant should reasonably have known that [REDACTED] [REDACTED] was a minor  
11 under 18 years, promote, employ, use persuade, induce and coerce the minor to engage  
12 in and assist others to engage in: posing and modeling alone and with others for purposes  
13 of preparing a film, photograph, negative and slide. To wit the last video

14 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
15 section 290. Willful failure to register is a crime.

16  
17 Count 18

18 On or about September 22, 2017, in the County of San Luis Obispo, State of California,  
19 the crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed  
20 in that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
21 which the defendant should reasonably have known that [REDACTED] [REDACTED] was a  
22 minor under 18 years, promote, employ, use persuade, induce and coerce the minor to  
23 engage in and assist others to engage in: posing and modeling alone and with others for  
24 purposes of preparing a film, photograph, negative and slide. To wit the first video.

25 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
26 section 290. Willful failure to register is a crime.

27  
28 Count 19  
PAGE - 8 -



1 On or about September 22, 2017, in the County of San Luis Obispo, State of California,  
2 the crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed  
3 in that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
4 which the defendant should reasonably have known that [REDACTED] was a  
5 minor under 18 years, promote, employ, use persuade, induce and coerce the minor to  
6 engage in and assist others to engage in: posing and modeling alone and with others for  
7 purposes of preparing a film, photograph, negative and slide. To wit the last video.  
8 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
9 section 290. Willful failure to register is a crime.

10  
11 Count 20

12 On or about March 13, 2018, in the County of San Luis Obispo, State of California, the  
13 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
14 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
15 which the defendant should reasonably have known that [REDACTED] was a  
16 minor under 18 years, promote, employ, use persuade, induce and coerce the minor to  
17 engage in and assist others to engage in: posing and modeling alone and with others for  
18 purposes of preparing a film, photograph, negative and slide.  
19 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
20 section 290. Willful failure to register is a crime.

21  
22 Count 21

23 On or about September 8, 2017, in the County of San Luis Obispo, State of California, the  
24 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
25 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
26 which the defendant should reasonably have known that [REDACTED] was a  
27 minor under 18 years, promote, employ, use persuade, induce and coerce the minor to  
28

1 engage in and assist others to engage in: posing and modeling alone and with others for  
2 purposes of preparing a film, photograph, negative and slide. To wit the first video.

3 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
4 section 290. Willful failure to register is a crime.

5  
6 Count 22

7 On or about September 8, 2017, in the County of San Luis Obispo, State of California, the  
8 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
9 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
10 which the defendant should reasonably have known that [REDACTED] [REDACTED] was a  
11 minor under 18 years, promote, employ, use persuade, induce and coerce the minor to  
12 engage in and assist others to engage in: posing and modeling alone and with others for  
13 purposes of preparing a film, photograph, negative and slide. To wit the last video.

14 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
15 section 290. Willful failure to register is a crime.

16  
17 Count 23

18 On or about August 28, 2018, in the County of San Luis Obispo, State of California, the  
19 crime of Using Minor For Sex Acts in violation of PC311.4(c), a Felony, was committed in  
20 that CHRIS LYNN BERDOLL did unlawfully and in possession of facts on the basis of  
21 which the defendant should reasonably have known that [REDACTED] [REDACTED] [REDACTED] [REDACTED] was  
22 a minor under 18 years, promote, employ, use persuade, induce and coerce the minor to  
23 engage in and assist others to engage in: posing and modeling alone and with others for  
24 purposes of preparing a film, photograph, negative and slide.

25 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
26 section 290. Willful failure to register is a crime.

1 On or between September 19, 2017 and September 19, 2018, in the County of San Luis  
2 Obispo, State of California, the crime of Using Minor For Sex Acts in violation of  
3 PC311.4(c), a Felony, was committed in that CHRIS LYNN BERDOLL did unlawfully and  
4 in possession of facts on the basis of which the defendant should reasonably have known  
5 that [REDACTED] was a minor under 18 years, promote, employ, use  
6 persuade, induce and coerce the minor to engage in and assist others to engage  
7 in: posing and modeling alone and with others for purposes of preparing a film,  
8 photograph, negative and slide.

9 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
10 section 290. Willful failure to register is a crime.

11  
12 Count 25


13 On or about February 11, 2018, in the County of San Luis Obispo, State of California, the  
14 crime of Possession Of Matter Depicting Minor Engaging In Sexual Conduct in violation of  
15 PC311.11(a), a Felony, was committed in that CHRIS LYNN BERDOLL did knowingly and  
16 unlawfully possess and control matter, to wit: Child Pornography the production of which  
17 involved the use of a person under the age of 18 years, said defendant knowing that the  
18 matter depicted a person under the age of 18 years, personally engaging in and simulating  
19 sexual conduct as defined in Penal Code Section 311.4(d).

20 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
21 section 290. Willful failure to register is a crime.

1 Contrary to the form, force and effect of that statute in such cases made and  
2 provided and against the peace and dignity of the people of the State of California.

3 Dated: September 1, 2020

4 DAN DOW  
5 DISTRICT ATTORNEY

6   
7 By: \_\_\_\_\_  
8 DANIELLE E BAKER  
9 DEPUTY DISTRICT ATTORNEY

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

SUMMARY PAGE

Cnt	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
2	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
3	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
4	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
5	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
6	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
7	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
8	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
9	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
10	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
11	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
12	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
13	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
14	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
15	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
16	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
17	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
18	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
19	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
20	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
21	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
22	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
23	PC311.4(c)	16-2-3* State Prison	Chris Lynn Berdoll		
24	PC311.4(c)	16-2-3* State	Chris Lynn Berdoll		

		Prison			
25	PC311.11(a)	16-2-3 State Prison	Chris Lynn Berdoll		

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28