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 District Attorney
 2 STATE BAR MEMBERSHIP NO. 88837
 SAN JOAQUIN COUNTY
 3 By: ANGELA LAUREN HAYES
 Deputy District Attorney
 4 222 E WEBER AV RM 202
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FILED
 SUPERIOR COURT-STOCKTON
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 ROSA BUNQUEIRO, CLERK
 BY *[Signature]*
 DEPUTY

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6 Attorneys for Plaintiff

8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN

10 The People of the State of California,) No TP08-11100
 11) TP Case
) DA Case: COM 0603140
 12 Plaintiff,)
) AMENDED
) COMPLAINT
 13 v.)
) SF11031910
 14 MICHAEL LUTHER SCHUMACHER)
 15 KELLY LAYNE LAU)
 CAREN RAMIREZ)
 [REDACTED])
 16 aka NICKNAME TONY)
)
 17 Defendant(s).)

18 -----
 19 I, the undersigned, say, on information and belief, that in
 20 the County of SAN JOAQUIN, State of California:

21 AS TO ALL DEFENDANTS
 22 PC 206 TORTURE

23 COUNT: 001, On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
 24 crime of TORTURE, in violation of Section 206 of the Penal Code,
 25 a FELONY, was committed by MICHAEL LUTHER SCHUMACHER, KELLY
 26 LAYNE LAU, CAREN RAMIREZ, AND ANTHONY VINCENT WAITERS, who at
 27 the time and place last aforesaid did willfully and unlawfully
 28 and with the intent to cause cruel and extreme pain and

1 suffering for the purpose of revenge, extortion, persuasion and
 2 for a sadistic purpose, inflict great bodily injury, as defined
 3 in Penal Code section 12022.7 upon "JOHN K. DOE"; (DOB:
 4 09.15.92),

5
 6 PC 205 AS TO ALL DEFENDANTS
 AGGRAVATED MAYHEM

7 COUNT: 002, for a further and separate cause of complaint, being
 8 a different offense from but connected in its commission with
 9 the charge set forth in Count 001, complainant further complains
 10 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
 11 crime of AGGRAVATED MAYHEM, in violation of Section 205 of the
 12 Penal Code, a FELONY, was committed by MICHAEL LUTHER SCHUMACHER
 13 KELLY LAYNE LAU, CAREN RAMIREZ, AND ANTHONY VINCENT WAITERS,
 14 who at the time and place last aforesaid, did willfully,
 15 unlawfully, and under circumstances manifesting extreme
 16 indifference to the physical and psychological well being of
 17 another, intentionally cause permanent disability and
 18 disfigurement and deprivation of a limb, organ and body member
 19 of "JOHN K. DOE"; (DOB: 09.15.92),.

20
 21 AS TO MICHAEL LUTHER SCHUMACHER,
 KELLY LAYNE LAU,
 CAREN RAMIREZ, ONLY
 22 PC 207(A) KIDNAPPING

23 COUNT: 003, for a further and separate cause of complaint, being
 24 a different offense from but connected in its commission with
 25 the charge set forth in Count 002, complainant further complains
 26 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
 27 crime of KIDNAPPING, in violation of Section 207(a) of the Penal
 28 Code, a FELONY, was committed by MICHAEL LUTHER SCHUMACHER,

1 KELLY LAYNE LAU, AND CAREN RAMIREZ, who at the time and place
2 last aforesaid, did willfully and forcibly steal, take and
3 arrest "JOHN K. DOE"; (DOB: 09.15.92), in the County of SAN
4 JOAQUIN, California, and did take the said victim into another
5 country, state, county and another part of the County of SAN
6 JOAQUIN,. It is further alleged that the above offense is a
7 serious FELONY within the meaning of Penal Code Section
8 1192.7(c)(20).

9
10 AS TO ALL DEFENDANTS
PC 273D(A) CORPORAL INJURY TO CHILD

11 COUNT: 004, for a further and separate cause of complaint, being
12 a different offense from but connected in its commission with
13 the charge set forth in Count 003, complainant further complains
14 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
15 crime of CORPORAL INJURY TO CHILD, in violation of Section
16 273d(a) of the Penal Code, a FELONY, was committed by MICHAEL
17 LUTHER SCHUMACHER, KELLY LAYNE LAU, CAREN RAMIREZ, AND ANTHONY
18 VINCENT WAITERS, who at the time and place last aforesaid did
19 willfully and unlawfully inflict cruel and inhuman corporal
20 punishment and injury, resulting in a traumatic condition upon a
21 child, to wit: "JOHN K. DOE"; (DOB: 09.15.92),.

22
23 AS TO MICHAEL LUTHER SCHUMACHER, ONLY
PC 12022(B)(1) PERSONAL USE OF NON-FIREARM WEAPON

24 It is further alleged that in the commission or attempted
25 commission of the above offense, the defendant MICHAEL LUTHER
26 SCHUMACHER, did personally use a BELT, within the meaning of
27 Penal Code Section 12022(b)(1).

28

AS TO MICHAEL LUTHER SCHUMACHER, ONLY
INFLECTION OF GREAT BODILY INJURY

1
2 PC 12022.7(A)
3 It is further alleged that in the commission of the above
4 offense the said defendant(s) MICHAEL LUTHER SCHUMACHER,,
5 personally inflicted great bodily injury upon "JOHN K. DOE";
6 (DOB: 09.15.92), not an accomplice to the above offense, within
7 the meaning of Penal Code Section 12022.7 and also causing the
8 above offense to be a serious felony within the meaning of Penal
9 Code Section 1192.7(c)(8).

10
11 AS TO KELLY LAYNE LAU, ONLY
12 PC 12022(B)(1) PERSONAL USE OF NON-FIREARM WEAPON

13 It is further alleged that in the commission or attempted
14 commission of the above offense, the defendant KELLY LAYNE LAU,
15 did personally use a BELT, within the meaning of Penal Code
16 Section 12022(b)(1).

17 AS TO KELLY LAYNE LAU, ONLY
18 PC 12022.7(A) INFLECTION OF GREAT BODILY INJURY

19 It is further alleged that in the commission of the above
20 offense the said defendant(s) KELLY LAYNE LAU,, personally
21 inflicted great bodily injury upon "JOHN K. DOE"; (DOB:
22 09.15.92), not an accomplice to the above offense, within the
23 meaning of Penal Code Section 12022.7 and also causing the above
24 offense to be a serious felony within the meaning of Penal Code
25 Section 1192.7(c)(8).

26 AS TO CAREN RAMIREZ, ONLY
27 PC 12022(B)(1) PERSONAL USE OF NON-FIREARM WEAPON

28 It is further alleged that in the commission or attempted
commission of the above offense, the defendant CAREN RAMIREZ,

1 did personally use a BELT, within the meaning of Penal Code
 2 Section 12022(b)(1).

3
 4 AS TO CAREN RAMIREZ, ONLY
 PC 12022.7(A) INFLECTION OF GREAT BODILY INJURY

5 It is further alleged that in the commission of the above
 6 offense the said defendant(s) CAREN RAMIREZ,, personally
 7 inflicted great bodily injury upon "JOHN K. DOE"; (DOB:
 8 09.15.92), not an accomplice to the above offense, within the
 9 meaning of Penal Code Section 12022.7 and also causing the above
 10 offense to be a serious felony within the meaning of Penal Code
 11 Section 1192.7(c)(8).

12
 13 AS TO ALL DEFENDANTS
 PC 273D(A) CORPORAL INJURY TO CHILD

14 COUNT: 005, for a further and separate cause of complaint, being
 15 a different offense from but connected in its commission with
 16 the charge set forth in Count 004, complainant further complains
 17 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
 18 crime of CORPORAL INJURY TO CHILD, in violation of Section
 19 273d(a) of the Penal Code, a FELONY, was committed by MICHAEL
 20 LUTHER SCHUMACHER, KELLY LAYNE LAU, CAREN RAMIREZ, AND ANTHONY
 21 VINCENT WAITERS, who at the time and place last aforesaid did
 22 willfully and unlawfully inflict cruel and inhuman corporal
 23 punishment and injury, resulting in a traumatic condition upon a
 24 child, to wit: "JOHN K. DOE"; (DOB: 09.15.92),.

25
 26 AS TO MICHAEL LUTHER SCHUMACHER, ONLY
 PC 12022(B)(1) PERSONAL USE OF NON-FIREARM WEAPON

27 It is further alleged that in the commission or attempted
 28 commission of the above offense, the defendant MICHAEL LUTHER

1 SCHUMACHER, did personally use a KNIFE, within the meaning of
2 Penal Code Section 12022(b)(1).

3
4 AS TO MICHAEL LUTHER SCHUMACHER, ONLY
PC 12022.7(A) INFLICTION OF GREAT BODILY INJURY

5 It is further alleged that in the commission of the above
6 offense the said defendant(s) MICHAEL LUTHER SCHUMACHER,,
7 personally inflicted great bodily injury upon KNIFE, not an
8 accomplice to the above offense, within the meaning of Penal
9 Code Section 12022.7 and also causing the above offense to be a
10 serious felony within the meaning of Penal Code Section
11 1192.7(c)(8).

12
13 AS TO KELLY LAYNE LAU, ONLY
PC 12022(B)(1) PERSONAL USE OF NON-FIREARM WEAPON

14 It is further alleged that in the commission or attempted
15 commission of the above offense, the defendant KELLY LAYNE LAU,
16 did personally use a KNIFE, within the meaning of Penal Code
17 Section 12022(b)(1).

18
19 AS TO KELLY LAYNE LAU, ONLY
PC 12022.7(A) INFLICTION OF GREAT BODILY INJURY

20 It is further alleged that in the commission of the above
21 offense the said defendant(s) KELLY LAYNE LAU,, personally
22 inflicted great bodily injury upon "JOHN K. DOE"; (DOB:
23 09.15.92), not an accomplice to the above offense, within the
24 meaning of Penal Code Section 12022.7 and also causing the above
25 offense to be a serious felony within the meaning of Penal Code
26 Section 1192.7(c)(8).

AS TO CAREN RAMIREZ, ONLY
PERSONAL USE OF NON-FIREARM WEAPON

1
2 PC 12022(B)(1)
3 It is further alleged that in the commission or attempted
4 commission of the above offense, the defendant CAREN RAMIREZ,
5 did personally use a KNIFE, within the meaning of Penal Code
6 Section 12022(b)(1).

7
8 AS TO CAREN RAMIREZ, ONLY
9 PC 12022.7(A) INFLICTION OF GREAT BODILY INJURY

10 It is further alleged that in the commission of the above
11 offense the said defendant(s) CAREN RAMIREZ,, personally
12 inflicted great bodily injury upon "JOHN K. DOE"; (DOB:
13 09.15.92), not an accomplice to the above offense, within the
14 meaning of Penal Code Section 12022.7 and also causing the above
15 offense to be a serious felony within the meaning of Penal Code
16 Section 1192.7(c)(8).

17 AS TO ALL DEFENDANTS
18 PC 273D(A) CORPORAL INJURY TO CHILD

19 COUNT: 006, for a further and separate cause of complaint, being
20 a different offense from but connected in its commission with
21 the charge set forth in Count 005, complainant further complains
22 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
23 crime of CORPORAL INJURY TO CHILD, in violation of Section
24 273d(a) of the Penal Code, a FELONY, was committed by MICHAEL
25 LUTHER SCHUMACHER, KELLY LAYNE LAU, CAREN RAMIREZ, AND ANTHONY
26 VINCENT WAITERS, who at the time and place last aforesaid did
27 willfully and unlawfully inflict cruel and inhuman corporal
28 punishment and injury, resulting in a traumatic condition upon a
child, to wit: "JOHN K. DOE"; (DOB: 09.15.92),.

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AS TO MICHAEL LUTHER SCHUMACHER, ONLY
PERSONAL USE OF NON-FIREARM WEAPON

It is further alleged that in the commission or attempted
commission of the above offense, the defendant MICHAEL LUTHER
SCHUMACHER, did personally use a BASEBALL BAT, within the
meaning of Penal Code Section 12022(b)(1).

AS TO MICHAEL LUTHER SCHUMACHER, ONLY
INFLICTION OF GREAT BODILY INJURY

It is further alleged that in the commission of the above
offense the said defendant(s) MICHAEL LUTHER SCHUMACHER,,
personally inflicted great bodily injury upon "JOHN K. DOE";
(DOB: 09.15.92), not an accomplice to the above offense, within
the meaning of Penal Code Section 12022.7 and also causing the
above offense to be a serious felony within the meaning of Penal
Code Section 1192.7(c)(8).

AS TO KELLY LAYNE LAU, ONLY
PERSONAL USE OF NON-FIREARM WEAPON

It is further alleged that in the commission or attempted
commission of the above offense, the defendant KELLY LAYNE LAU,
did personally use a BASEBALL BAT, within the meaning of Penal
Code Section 12022(b)(1).

AS TO KELLY LAYNE LAU, ONLY
INFLICTION OF GREAT BODILY INJURY

It is further alleged that in the commission of the above
offense the said defendant(s) KELLY LAYNE LAU,, personally
inflicted great bodily injury upon "JOHN K. DOE"; (DOB:
09.15.92), not an accomplice to the above offense, within the
meaning of Penal Code Section 12022.7 and also causing the above

1 offense to be a serious felony within the meaning of Penal Code
2 Section 1192.7(c)(8).

3
4 AS TO CAREN RAMIREZ, ONLY
PC 12022(B)(1) PERSONAL USE OF NON-FIREARM WEAPON

5 It is further alleged that in the commission or attempted
6 commission of the above offense, the defendant CAREN RAMIREZ,
7 did personally use a BASEBALL BAT, within the meaning of Penal
8 Code Section 12022(b)(1).

9
10 AS TO CAREN RAMIREZ, ONLY
PC 12022.7(A) INFLECTION OF GREAT BODILY INJURY

11 It is further alleged that in the commission of the above
12 offense the said defendant(s) CAREN RAMIREZ,, personally
13 inflicted great bodily injury upon "JOHN K. DOE"; (DOB:
14 09.15.92), not an accomplice to the above offense, within the
15 meaning of Penal Code Section 12022.7 and also causing the above
16 offense to be a serious felony within the meaning of Penal Code
17 Section 1192.7(c)(8).

18
19 AS TO ANTHONY VINCENT WAITERS, ONLY
PC 12022(B)(1) PERSONAL USE OF NON-FIREARM WEAPON

20 It is further alleged that in the commission or attempted
21 commission of the above offense, the defendant ANTHONY VINCENT
22 WAITERS, did personally use a BASEBALL BAT, within the meaning
23 of Penal Code Section 12022(b)(1).

24
25 AS TO ANTHONY VINCENT WAITERS, ONLY
PC 12022.7(A) INFLECTION OF GREAT BODILY INJURY

26 It is further alleged that in the commission of the above
27 offense the said defendant(s) ANTHONY VINCENT WAITERS,,
28 personally inflicted great bodily injury upon "JOHN K. DOE";

1 (DOB: 09.15.92), not an accomplice to the above offense, within
2 the meaning of Penal Code Section 12022.7 and also causing the
3 above offense to be a serious felony within the meaning of Penal
4 Code Section 1192.7(c)(8).

5

6 PC 273D(A) AS TO ALL DEFENDANTS
CORPORAL INJURY TO CHILD

7 COUNT: 007, for a further and separate cause of complaint, being
8 a different offense from but connected in its commission with
9 the charge set forth in Count 006, complainant further complains
10 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
11 crime of CORPORAL INJURY TO CHILD, in violation of Section
12 273d(a) of the Penal Code, a FELONY, was committed by MICHAEL
13 LUTHER SCHUMACHER, KELLY LAYNE LAU, CAREN RAMIREZ, AND ANTHONY
14 VINCENT WAITERS, who at the time and place last aforesaid did
15 willfully and unlawfully inflict cruel and inhuman corporal
16 punishment and injury, resulting in a traumatic condition upon a
17 child, to wit: "JOHN K. DOE"; (DOB: 09.15.92),.

18

19 PC 12022.7(A) AS TO MICHAEL LUTHER SCHUMACHER, ONLY
INFLICTION OF GREAT BODILY INJURY

20 It is further alleged that in the commission of the above
21 offense the said defendant(s) MICHAEL LUTHER SCHUMACHER,,
22 personally inflicted great bodily injury upon "JOHN K. DOE";
23 (DOB: 09.15.92), not an accomplice to the above offense, within
24 the meaning of Penal Code Section 12022.7 and also causing the
25 above offense to be a serious felony within the meaning of Penal
26 Code Section 1192.7(c)(8).

27

28

AS TO KELLY LAYNE LAU, ONLY
INFLICTION OF GREAT BODILY INJURY

1
2 PC 12022.7(A)
3 It is further alleged that in the commission of the above
4 offense the said defendant(s) KELLY LAYNE LAU,, personally
5 inflicted great bodily injury upon "JOHN K. DOE"; (DOB:
6 09.15.92), not an accomplice to the above offense, within the
7 meaning of Penal Code Section 12022.7 and also causing the above
8 offense to be a serious felony within the meaning of Penal Code
9 Section 1192.7(c)(8).

10
11 AS TO CAREN RAMIREZ, ONLY
12 INFLICTION OF GREAT BODILY INJURY

13 It is further alleged that in the commission of the above
14 offense the said defendant(s) CAREN RAMIREZ,, personally
15 inflicted great bodily injury upon "JOHN K. DOE"; (DOB:
16 09.15.92), not an accomplice to the above offense, within the
17 meaning of Penal Code Section 12022.7 and also causing the above
18 offense to be a serious felony within the meaning of Penal Code
19 Section 1192.7(c)(8).

20 AS TO ANTHONY VINCENT WAITERS, ONLY
21 INFLICTION OF GREAT BODILY INJURY

22 It is further alleged that in the commission of the above
23 offense the said defendant(s) ANTHONY VINCENT WAITERS,,
24 personally inflicted great bodily injury upon "JOHN K. DOE";
25 (DOB: 09.15.92), not an accomplice to the above offense, within
26 the meaning of Penal Code Section 12022.7 and also causing the
27 above offense to be a serious felony within the meaning of Penal
28 Code Section 1192.7(c)(8).

1

2 PC 236

AS TO ALL DEFENDANTS
FALSE IMPRISONMENT BY VIOLENCE

3 COUNT: 008, for a further and separate cause of complaint, being
4 a different offense from but connected in its commission with
5 the charge set forth in Count 007, complainant further complains
6 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
7 crime of FALSE IMPRISONMENT BY VIOLENCE, in violation of Section
8 236 of the Penal Code, a FELONY, was committed by MICHAEL LUTHER
9 SCHUMACHER, KELLY LAYNE LAU, CAREN RAMIREZ, AND ANTHONY VINCENT
10 WAITERS, who at the time and place last aforesaid, did willfully
11 and unlawfully violate the personal liberty of "JOHN K. DOE";
12 (DOB: 09.15.92), said violation being effected by violence,
13 menace, fraud, and deceit.

14

15 PC 273A(A)

AS TO ALL DEFENDANTS
CHILD ABUSE/ENDANGERMENT

16 COUNT: 009, for a further and separate cause of complaint, being
17 a different offense from but connected in its commission with
18 the charge set forth in Count 008, complainant further complains
19 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
20 crime of CHILD ABUSE/ENDANGERMENT, in violation of Section
21 273a(a) of the Penal Code, a FELONY, was committed by MICHAEL
22 LUTHER SCHUMACHER, KELLY LAYNE LAU, CAREN RAMIREZ, AND ANTHONY
23 VINCENT WAITERS, who at the time and place last aforesaid, did
24 willfully and unlawfully, under circumstances likely to produce
25 great bodily harm and death, injure, cause, and permit a child,
26 "JOHN K. DOE", date of birth 09.15.92, to suffer and to be
27 inflicted with unjustifiable physical pain and mental suffering,
28 and having the care and custody of said child, injure, cause and

1 permit the person and health of said child to be injured and did
2 willfully cause and permit said child to be placed in such
3 situation that his/her person and health was endangered.

4
5 AS TO MICHAEL LUTHER SCHUMACHER,
6 PC 273A(A) KELLY LAYNE LAU, ONLY
CHILD ABUSE/ENDANGERMENT

7 COUNT: 010, for a further and separate cause of complaint, being
8 a different offense from but connected in its commission with
9 the charge set forth in Count 009, complainant further complains
10 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
11 crime of CHILD ABUSE/ENDANGERMENT, in violation of Section
12 273a(a) of the Penal Code, a FELONY, was committed by MICHAEL
13 LUTHER SCHUMACHER, AND KELLY LAYNE LAU, who at the time and
14 place last aforesaid, did willfully and unlawfully, under
15 circumstances likely to produce great bodily harm and death,
16 injure, cause, and permit a child, "JANE S. DOE", date of birth
17 08.21.99, to suffer and to be inflicted with unjustifiable
18 physical pain and mental suffering, and having the care and
19 custody of said child, injure, cause and permit the person and
20 health of said child to be injured and did willfully cause and
21 permit said child to be placed in such situation that his/her
22 person and health was endangered.

23
24 AS TO MICHAEL LUTHER SCHUMACHER,
25 PC 273A(A) KELLY LAYNE LAU, ONLY
CHILD ABUSE/ENDANGERMENT

26 COUNT: 011, for a further and separate cause of complaint, being
27 a different offense from but connected in its commission with
28 the charge set forth in Count 010, complainant further complains

1 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
2 crime of CHILD ABUSE/ENDANGERMENT, in violation of Section
3 273a(a) of the Penal Code, a FELONY, was committed by MICHAEL
4 LUTHER SCHUMACHER, AND KELLY LAYNE LAU, who at the time and
5 place last aforesaid, did willfully and unlawfully, under
6 circumstances likely to produce great bodily harm and death,
7 injure, cause, and permit a child, "JANE S. DOE", date of birth
8 10.21.03, to suffer and to be inflicted with unjustifiable
9 physical pain and mental suffering, and having the care and
10 custody of said child, injure, cause and permit the person and
11 health of said child to be injured and did willfully cause and
12 permit said child to be placed in such situation that his/her
13 person and health was endangered.

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AS TO MICHAEL LUTHER SCHUMACHER,
KELLY LAYNE LAU, ONLY
PC 273A(A) CHILD ABUSE/ENDANGERMENT

17 COUNT: 012, for a further and separate cause of complaint, being
18 a different offense from but connected in its commission with
19 the charge set forth in Count 011, complainant further complains
20 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
21 crime of CHILD ABUSE/ENDANGERMENT, in violation of Section
22 273a(a) of the Penal Code, a FELONY, was committed by MICHAEL
23 LUTHER SCHUMACHER, AND KELLY LAYNE LAU, who at the time and
24 place last aforesaid, did willfully and unlawfully, under
25 circumstances likely to produce great bodily harm and death,
26 injure, cause, and permit a child, "JOHN D. DOE", date of birth
27 01.25.06, to suffer and to be inflicted with unjustifiable
28 physical pain and mental suffering, and having the care and

1 custody of said child, injure, cause and permit the person and
2 health of said child to be injured and did willfully cause and
3 permit said child to be placed in such situation that his/her
4 person and health was endangered.

5
6 AS TO MICHAEL LUTHER SCHUMACHER,
7 PC 273A(A) KELLY LAYNE LAU, ONLY
8 CHILD ABUSE/ENDANGERMENT
9 -----

10 COUNT: 013, for a further and separate cause of complaint, being
11 a different offense from but connected in its commission with
12 the charge set forth in Count 012, complainant further complains
13 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
14 crime of CHILD ABUSE/ENDANGERMENT, in violation of Section
15 273a(a) of the Penal Code, a FELONY, was committed by MICHAEL
16 LUTHER SCHUMACHER, AND KELLY LAYNE LAU, who at the time and
17 place last aforesaid, did willfully and unlawfully, under
18 circumstances likely to produce great bodily harm and death,
19 injure, cause, and permit a child, "JOHN M. DOE", date of birth
20 03.16.07, to suffer and to be inflicted with unjustifiable
21 physical pain and mental suffering, and having the care and
22 custody of said child, injure, cause and permit the person and
23 health of said child to be injured and did willfully cause and
24 permit said child to be placed in such situation that his/her
25 person and health was endangered.

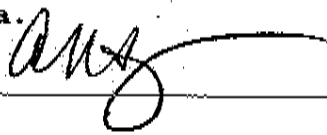
26 If the above-named defendant(s) is/are presently on probation in
27 San Joaquin County, any evidence presented at a preliminary
28 hearing in the instant case will be used not only as a basis for
a holding order in this case but also as evidence of a violation

1 of probation and, at any formal hearing on that violation of
2 probation, the People will move the transcript of the preliminary
3 hearing into evidence as a basis for the violation.

4
5 Pursuant to Penal Code Section 1054.5(b), the People hereby
6 informally request that the defendant and his/her attorney
7 disclose to the People all information and materials described
8 in Penal Code Section 1054.3.

9
10 I declare under penalty of perjury that the foregoing is
11 true and correct except for those things stated on information
12 and belief and those I believe to be true.

13
14 Executed on 12/10/08, at STOCKTON, California.

A handwritten signature in black ink, appearing to be 'AMJ', is written over a horizontal line.