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 District Attorney
 2 STATE BAR MEMBERSHIP NO. 88837
 SAN JOAQUIN COUNTY
 3 By: ANGELA LAUREN HAYES
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FILED
 SUPERIOR COURT - STOCKTON
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 ROSA JUNGUENO, CLERK
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 REPLY

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 6 Attorneys for Plaintiff
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8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN
 9

10) No TP08-11100
11	The People of the State of California,) TP Case
12) DA Case: COM 0603140
13	Plaintiff,)
14)
15	v.) COMPLAINT
16)
17	MICHAEL LUTHER SCHUMACHER)
18)
19	KELLY LAYNE LAU)
20)
21	CAREN RAMIREZ)
22)
23	Defendant(s).))

24 I, the undersigned, say, on information and belief, that in
 25 the County of SAN JOAQUIN, State of California:

26 AS TO ALL DEFENDANTS
 27 PC 206 TORTURE

28 COUNT: 001, On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
 crime of TORTURE, in violation of Section 206 of the Penal Code,
 a FELONY, was committed by MICHAEL LUTHER SCHUMACHER, KELLY
 LAYNE LAU, AND CAREN RAMIREZ, who at the time and place last
 aforesaid did willfully and unlawfully and with the intent to
 cause cruel and extreme pain and suffering for the purpose of
 revenge, extortion, persuasion and for a sadistic purpose,

1 inflict great bodily injury, as defined in Penal Code section
2 12022.7 upon "JOHN K. DOE"; (DOB: 09.15.92),

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4 PC 205 AS TO ALL DEFENDANTS
AGGRAVATED MAYHEM

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

17

18 PC 207(A) AS TO ALL DEFENDANTS
KIDNAPPING

19 COUNT: 003, 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 002, complainant further complains
22 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
23 crime of KIDNAPPING, in violation of Section 207(a) of the Penal
24 Code, a FELONY, was committed by MICHAEL LUTHER SCHUMACHER,
25 KELLY LAYNE LAU, AND CAREN RAMIREZ, who at the time and place
26 last aforesaid, did willfully and forcibly steal, take and
27 arrest "JOHN K. DOE"; (DOB: 09.15.92), in the County of SAN
28 JOAQUIN, California, and did take the said victim into another

1 country, state, county and another part of the County of SAN
 2 JOAQUIN,. It is further alleged that the above offense is a
 3 serious FELONY within the meaning of Penal Code Section
 4 1192.7(c) (20).

5
 6 AS TO ALL DEFENDANTS
 PC 273D(A) CORPORAL INJURY TO CHILD

7 COUNT: 004, 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 003, 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, AND CAREN RAMIREZ, who at
 14 the time and place last aforesaid did willfully and unlawfully
 15 inflict cruel and inhuman corporal punishment and injury,
 16 resulting in a traumatic condition upon a child, to wit: "JOHN
 17 K. DOE"; (DOB: 09.15.92),.

18
 19 AS TO MICHAEL LUTHER SCHUMACHER, 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 MICHAEL LUTHER
 22 SCHUMACHER, did personally use a BELT, within the meaning of
 23 Penal Code Section 12022(b) (1).

24
 25 AS TO MICHAEL LUTHER SCHUMACHER, 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) MICHAEL LUTHER SCHUMACHER,,
 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 AS TO KELLY LAYNE LAU, ONLY
PC 12022(B)(1) PERSONAL USE OF NON-FIREARM WEAPON

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

11
12 AS TO KELLY LAYNE LAU, ONLY
PC 12022.7(A) INFLECTION OF GREAT BODILY INJURY

13 It is further alleged that in the commission of the above
14 offense the said defendant(s) KELLY LAYNE LAU,, 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
21 AS TO CAREN RAMIREZ, ONLY
PC 12022(B)(1) PERSONAL USE OF NON-FIREARM WEAPON

22 It is further alleged that in the commission or attempted
23 commission of the above offense, the defendant CAREN RAMIREZ,
24 did personally use a BELT, within the meaning of Penal Code
25 Section 12022(b)(1).

26
27 AS TO CAREN RAMIREZ, ONLY
PC 12022.7(A) INFLECTION OF GREAT BODILY INJURY

28 It is further alleged that in the commission of the above

1 offense the said defendant(s) CAREN RAMIREZ,, personally
 2 inflicted great bodily injury upon "JOHN K. DOE"; (DOB:
 3 09.15.92), not an accomplice to the above offense, within the
 4 meaning of Penal Code Section 12022.7 and also causing the above
 5 offense to be a serious felony within the meaning of Penal Code
 6 Section 1192.7(c)(8).

7
 8 PC 273D(A) AS TO ALL DEFENDANTS
 CORPORAL INJURY TO CHILD

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

20
 21 PC 12022(B)(1) AS TO MICHAEL LUTHER SCHUMACHER, ONLY
 PERSONAL USE OF NON-FIREARM WEAPON

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

26
 27 PC 12022.7(A) AS TO MICHAEL LUTHER SCHUMACHER, ONLY
 INFLECTION OF GREAT BODILY INJURY

 28 It is further alleged that in the commission of the above

1 offense the said defendant(s) MICHAEL LUTHER SCHUMACHER,,
 2 personally inflicted great bodily injury upon KNIFE, not an
 3 accomplice to the above offense, within the meaning of Penal
 4 Code Section 12022.7 and also causing the above offense to be a
 5 serious felony within the meaning of Penal Code Section
 6 1192.7(c)(8).

7

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

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

13

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

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

22

23 PC 12022(B)(1) AS TO CAREN RAMIREZ, ONLY
 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 CAREN RAMIREZ,
 26 did personally use a KNIFE, within the meaning of Penal Code
 27 Section 12022(b)(1).

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AS TO CAREN RAMIREZ, ONLY
INFLICTION OF GREAT BODILY INJURY

It is further alleged that in the commission of the above offense the said defendant(s) CAREN RAMIREZ,, 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 ALL DEFENDANTS
CORPORAL INJURY TO CHILD

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

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).

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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 CAREN RAMIREZ, ONLY
PERSONAL USE OF NON-FIREARM WEAPON

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

AS TO ALL DEFENDANTS
CORPORAL INJURY TO CHILD

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

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

It is further alleged that in the commission of the above

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

7
 8 AS TO KELLY LAYNE LAU, ONLY
 PC 12022.7(A) INFLICTION OF GREAT BODILY INJURY

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

16
 17 AS TO CAREN RAMIREZ, ONLY
 PC 12022.7(A) INFLICTION OF GREAT BODILY INJURY

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

25
 26 AS TO ALL DEFENDANTS
 PC 236 FALSE IMPRISONMENT BY VIOLENCE

27 COUNT: 008, for a further and separate cause of complaint, being
 28 a different offense from but connected in its commission with

1 the charge set forth in Count 007, complainant further complains
2 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
3 crime of FALSE IMPRISONMENT BY VIOLENCE, in violation of Section
4 236 of the Penal Code, a FELONY, was committed by MICHAEL LUTHER
5 SCHUMACHER, KELLY LAYNE LAU, AND CAREN RAMIREZ, who at the time
6 and place last aforesaid, did willfully and unlawfully violate
7 the personal liberty of "JOHN K. DOE"; (DOB: 09.15.92), said
8 violation being effected by violence, menace, fraud, and deceit.

9
10 AS TO ALL DEFENDANTS
PC 273A(A) CHILD ABUSE/ENDANGERMENT

11 COUNT: 009, 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 008, complainant further complains
14 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
15 crime of CHILD ABUSE/ENDANGERMENT, in violation of Section
16 273a(a) of the Penal Code, a FELONY, was committed by MICHAEL
17 LUTHER SCHUMACHER, KELLY LAYNE LAU, AND CAREN RAMIREZ, who at
18 the time and place last aforesaid, did willfully and unlawfully,
19 under circumstances likely to produce great bodily harm and
20 death, injure, cause, and permit a child, "JOHN K. DOE", date of
21 birth 09.15.92, to suffer and to be inflicted with unjustifiable
22 physical pain and mental suffering, and having the care and
23 custody of said child, injure, cause and permit the person and
24 health of said child to be injured and did willfully cause and
25 permit said child to be placed in such situation that his/her
26 person and health was endangered.

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

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

20
21 AS TO MICHAEL LUTHER SCHUMACHER,
22 PC 273A(A) KELLY LAYNE LAU, ONLY
CHILD ABUSE/ENDANGERMENT

23 COUNT: 011, 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 010, complainant further complains
26 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
27 crime of CHILD ABUSE/ENDANGERMENT, in violation of Section
28 273a(a) of the Penal Code, a FELONY, was committed by MICHAEL

1 LUTHER SCHUMACHER, AND KELLY LAYNE LAU, who at the time and
2 place last aforesaid, did willfully and unlawfully, under
3 circumstances likely to produce great bodily harm and death,
4 injure, cause, and permit a child, "JANE S. DOE", date of birth
5 08.21.99, to suffer and to be inflicted with unjustifiable
6 physical pain and mental suffering, and having the care and
7 custody of said child, injure, cause and permit the person and
8 health of said child to be injured and did willfully cause and
9 permit said child to be placed in such situation that his/her
10 person and health was endangered.

11
12 AS TO MICHAEL LUTHER SCHUMACHER,
13 PC 273A(A) KELLY LAYNE LAU, ONLY
CHILD ABUSE/ENDANGERMENT

14 COUNT: 012, 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 011, complainant further complains
17 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
18 crime of CHILD ABUSE/ENDANGERMENT, in violation of Section
19 273a(a) of the Penal Code, a FELONY, was committed by MICHAEL
20 LUTHER SCHUMACHER, AND KELLY LAYNE LAU, who at the time and
21 place last aforesaid, did willfully and unlawfully, under
22 circumstances likely to produce great bodily harm and death,
23 injure, cause, and permit a child, "JOHN D. DOE", date of birth
24 01.25.06, to suffer and to be inflicted with unjustifiable
25 physical pain and mental suffering, and having the care and
26 custody of said child, injure, cause and permit the person and
27 health of said child to be injured and did willfully cause and
28 permit said child to be placed in such situation that his/her

1 person and health was endangered.

2

3 AS TO ALL DEFENDANTS
PC 273A(A) CHILD ABUSE/ENDANGERMENT

4 COUNT: 013, for a further and separate cause of complaint, being
5 a different offense from but connected in its commission with
6 the charge set forth in Count 012, complainant further complains
7 and says: On or about JULY 2007 THROUGH DECEMBER 1, 2008 the
8 crime of CHILD ABUSE/ENDANGERMENT, in violation of Section
9 273a(a) of the Penal Code, a FELONY, was committed by MICHAEL
10 LUTHER SCHUMACHER, KELLY LAYNE LAU, AND CAREN RAMIREZ, who at
11 the time and place last aforesaid, did willfully and unlawfully,
12 under circumstances likely to produce great bodily harm and
13 death, injure, cause, and permit a child, "JOHN M. DOE", date of
14 birth 03.16.07, to suffer and to be inflicted with unjustifiable
15 physical pain and mental suffering, and having the care and
16 custody of said child, injure, cause and permit the person and
17 health of said child to be injured and did willfully cause and
18 permit said child to be placed in such situation that his/her
19 person and health was endangered.

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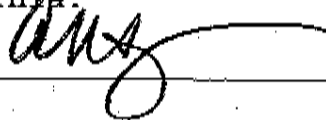
21 If the above-named defendant(s) is/are presently on probation in
22 San Joaquin County, any evidence presented at a preliminary
23 hearing in the instant case will be used not only as a basis for
24 a holding order in this case but also as evidence of a violation
25 of probation and, at any formal hearing on that violation of
26 probation, the People will move the transcript of the preliminary
27 hearing into evidence as a basis for the violation.

28

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

5
6 I declare under penalty of perjury that the foregoing is
7 true and correct except for those things stated on information
8 and belief and those I believe to be true.

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10 Executed on 12/04/08, at STOCKTON, California.

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