

FILED

DEC 18 2015

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CLERK OF THE SUPERIOR COURT
DEPUTY

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7 SUPERIOR COURT OF CALIFORNIA, COUNTY OF MONTEREY

8 SALINAS DIVISION

9 The People of the State of California

10 Plaintiff,

11 vs.

12 TAMI JOY HUNTSMAN **A**

13 GONZALO CURIEL **B**

14 Defendants.

No. **SS 15 2108 A/B**

SPD 15120801

DA Case: 816214

COMPLAINT A/W

ARR:

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17 The District Attorney of Monterey County, California hereby accuses the above named
18 defendants of the following criminal offenses occurring in the County of Monterey, State of
19 California.

20 **Count 1 PC 187(a): WILLFUL, DELIBERATE, AND PREMEDITATED MURDER -**
21 **FELONY as to Tami Joy Huntsman and Gonzalo Curiel** **A & B**

22 On or about November 27, 2015, in the County of Monterey, the crime of WILLFUL,
23 DELIBERATE, AND PREMEDITATED MURDER in violation of PC 187(a), a FELONY, was
24 committed by TAMI JOY HUNTSMAN AND GONZALO CURIEL, in that TAMI JOY
25 HUNTSMAN AND GONZALO CURIEL did unlawfully and with malice aforethought
26 murder JOHN DOE, a Human Being. It is further alleged that the aforesaid murder was committed
27 willfully, deliberately and with premeditation within the meaning of Penal Code section 189 and is
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1 a violent felony pursuant to Penal Code section 667.5(a)(c)(1). NOTICE: The above offense is a
2 serious felony within the meaning of Penal Code Section 1192.7(c). NOTICE: The above offense is
3 a violent felony within the meaning of Penal Code 667.5(c).

4 ENHANCEMENT 1

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6 PC190.2(a)(18): Spec Alleg-Murder With Torture **A+B**

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8 It is further alleged as to Count 1 that the murder of JOHN DOE was carried out by defendants,
9 GONZALO CUIEL AND TAMI JOY HUNTSMAN and that the murder was intentional and
10 involved the infliction of torture, within the meaning of Penal Code Section 190.2(a)(18).

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12 **Count 2 PC 187(a): WILLFUL, DELIBERATE, AND PREMEDITATED MURDER -**
13 **FELONY as to Tami Joy Huntsman and Gonzalo Curiel** **A+B**

14 On or about November 27, 2015, in the County of Monterey, the crime of WILLFUL,
15 DELIBERATE, AND PREMEDITATED MURDER in violation of PC 187(a), a FELONY, was
16 committed by TAMI JOY HUNTSMAN AND GONZALO CUIEL, in that TAMI JOY
17 HUNTSMAN AND GONZALO CUIEL did unlawfully and with malice aforethought murder
18 JANE DOE #1, a Human Being. It is further alleged that the aforesaid murder was committed
19 willfully, deliberately and with premeditation within the meaning of Penal Code section 189 and is
20 a violent felony pursuant to Penal Code section 667.5(a)(c)(1). NOTICE: The above offense is a
21 serious felony within the meaning of Penal Code Section 1192.7(c). NOTICE: The above offense is
22 a violent felony within the meaning of Penal Code 667.5(c).
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ENHANCEMENT 1

A & B

PC190.2(a)(18): Spec Alleg-Murder With Torture

It is further alleged as to Count 2 that the murder of JANE DOE #1 was carried out by defendants, GONZALO CURIEL AND TAMI JOY HUNTSMAN and that the murder was intentional and involved the infliction of torture, within the meaning of Penal Code Section 190.2(a)(18).

SPECIAL CIRCUMSTANCE ALLEGATION

A & B

PC190.2(a)(3): SPECIAL ALLEGATION - MULTIPLE MURDER

It is further alleged that the offenses charged in Counts 1 and 2 represent the special circumstance of Multiple Murder within the meaning of Penal Code Section 190.2(a)(3).

Count 3 PC273a(a): Child Abuse - Felony - FELONY as to Tami Joy Huntsman and Gonzalo Curiel

A & B

On or between December 13, 2014 and December 13, 2015, in the County of Monterey, the crime of CHILD ABUSE - FELONY in violation of PC273a(a), a FELONY, was committed by TAMI JOY HUNTSMAN AND GONZALO CURIEL, in that TAMI JOY HUNTSMAN AND GONZALO CURIEL did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, JANE DOE #2, to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, 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 situation that his/her person and health was/were endangered.

1 ENHANCEMENT 1

A+B

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3 PC 12022.7(a): SPECIAL ALLEGATION - GREAT BODILY INJURY

4 It is further alleged as to Count 3 that in the commission of the above offense the said defendants,
5 GONZALO CURIEL AND TAMI JOY HUNTSMAN, personally inflicted great bodily injury
6 upon JANE DOE #2, not an accomplice to the above offense, within the meaning of Penal Code
7 Section 12022.7(a) and also causing the above offense to become a serious felony within the
8 meaning of Penal Code Section 1192.7(c)(8).

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10 NOTICE: This offense is a serious felony and a violent felony within the meaning of Penal Code
11 sections 1192.7(c)(8) and 667.5(c)(8)

12 **Count 4 PC206: Torture - FELONY as to Tami Joy Huntsman and Gonzalo Curiel**

A+B

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14 On or between December 13, 2014 and November 27, 2015, in the County of Monterey, the
15 crime of TORTURE in violation of PC206, a FELONY, was committed by TAMI JOY
16 HUNTSMAN AND GONZALO CURIEL, in that TAMI JOY HUNTSMAN AND GONZALO
17 CURIEL did unlawfully and with the intent to cause cruel and extreme pain and suffering for the
18 purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as
19 defined in Penal Code section 12022.7, upon JOHN DOE.

20 **Count 5 PC206: Torture - FELONY as to Tami Joy Huntsman and Gonzalo Curiel**

A+B

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22 On or between December 13, 2014 and November 27, 2015, in the County of Monterey, the
23 crime of TORTURE in violation of PC 206, a FELONY, was committed by TAMI JOY
24 HUNTSMAN AND GONZALO CURIEL, in that TAMI JOY HUNTSMAN AND GONZALO
25 CURIEL did unlawfully and with the intent to cause cruel and extreme pain and suffering for the
26 purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as
27 defined in Penal Code section 12022.7, upon JANE DOE #1.
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A + B

Count 6 PC206: Torture - FELONY as to Tami Joy Huntsman and Gonzalo Curiel

On or between December 13, 2014 and December 13, 2015, in the County of Monterey, the crime of TORTURE in violation of PC206, a FELONY, was committed by TAMI JOY HUNTSMAN AND GONZALO CURIEL, in that TAMI JOY HUNTSMAN AND GONZALO CURIEL did 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, inflict great bodily injury, as defined in Penal Code section 12022.7, upon JANE DOE #2.

Count 7 PC 182(a)(1): CONSPIRACY TO COMMIT A CRIME - FELONY as to Tami Joy Huntsman and Gonzalo Curiel

A + B

On or between December 13, 2014 and December 13, 2015, in the County of Monterey, the crime of CONSPIRACY TO COMMIT A CRIME in violation of PC 182(a)(1), a FELONY, was committed by TAMI JOY HUNTSMAN AND GONZALO CURIEL, in that TAMI JOY HUNTSMAN AND GONZALO CURIEL did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Child Abuse, in violation of Section 273a(a) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Monterey:

1. Refused to provide proper clothing to Jane Doe #2
2. Refused to provide proper shelter for Jane Doe #2
3. Refused to provide proper sustenance to Jane Doe #2
4. Repeatedly restrained Jane Doe #2
5. Repeatedly struck and kicked Jane Doe #2
6. Broke numerous bones of Jane Doe #2
7. Refused to provide proper medical care to Jane Doe #2

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ENHANCEMENT 1

A + B

PC 12022.7(a): SPECIAL ALLEGATION - GREAT BODILY INJURY

It is further alleged as to Count 7 that in the commission of the above offense the said defendants, GONZALO CURIEL AND TAMI JOY HUNTSMAN, personally inflicted great bodily injury upon Jane Doe #2, not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8).

NOTICE: This offense is a serious felony and a violent felony within the meaning of Penal Code sections 1192.7(c)(8) and 667.5(c)(8)

Count 8 PC 182(a)(1): CONSPIRACY TO COMMIT A CRIME - FELONY as to Tami Joy Huntsman and Gonzalo Curiel

A + B

On or between December 13, 2014 and December 13, 2015, in the County of Monterey, the crime of CONSPIRACY TO COMMIT A CRIME in violation of PC 182(a)(1), a FELONY, was committed by TAMI JOY HUNTSMAN AND GONZALO CURIEL, in that TAMI JOY HUNTSMAN AND GONZALO CURIEL did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Torture, in violation of Section 206 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Monterey:

1. Refused to provide proper clothing to Jane Doe #2
2. Refused to provide proper shelter for Jane Doe #2
3. Refused to provide proper sustenance to Jane Doe #2
4. Repeatedly restrained Jane Doe #2

- 1 5. Repeatedly struck and kicked Jane Doe #2
- 2 6. Broke numerous bones of Jane Doe #2
- 3 7. Refused to provide proper medical care to Jane Doe #2

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5 ENHANCEMENT 1 A+B

6 PC 12022.7(a): SPECIAL ALLEGATION - GREAT BODILY INJURY

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8 It is further alleged as to Count 8 that in the commission of the above offense the said defendants,
9 GONZALO CURIEL AND TAMI JOY HUNTSMAN, personally inflicted great bodily injury
10 upon JANE DOE #2, not an accomplice to the above offense, within the meaning of Penal Code
11 Section 12022.7(a) and also causing the above offense to become a serious felony within the
12 meaning of Penal Code Section 1192.7(c)(8).

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14 NOTICE: This offense is a serious felony and a violent felony within the meaning of Penal Code
15 sections 1192.7(c)(8) and 667.5(c)(8).

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17 SPECIAL ALLEGATION AS TO GONZALO CURIEL ONLY B

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19 It is further alleged as to Counts 1 through 8, pursuant to subdivision (d)(1) of Section 707 of the
20 Welfare and Institutions code, that GONZALO CURIEL was a minor who was at least 16 years of
21 age the time of the commission of the above offense(s).

1 On this December 18, 2015, in the County of Monterey, I certify and declare under penalty
2 of perjury that the foregoing is true and correct.

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4 DEAN D. FLIPPO
District Attorney

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9 By: Jeannine M. Pacioni
Assistant District Attorney

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11 Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that
12 defendant(s) and his or her attorney provide to the People the discovery required by Penal Code
13 Section 1054.3. This is a continuing request pursuant to the provisions of Penal Code Section
14 1054.7.

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16 NOTICE TO ATTORNEY

17 The materials accompanying this notice may include information about witnesses which is
18 disclosed to you pursuant to Penal Code Section 1054.2, which reads as follows:
19 "No attorney may disclose or permit to be disclosed to a defendant, members of the defendant's
20 family or anyone else, the address or telephone number of a victim or witness whose name is
21 disclosed to the attorney pursuant to subdivision (a) Section 1054.1 unless specifically permitted to
22 do so by the Court after a hearing and showing of good cause."

23 Willful violation of this subdivision by an attorney is a misdemeanor. For purposes of this
24 section, all names included in the attached reports are deemed to be witnesses pursuant to
25 subdivision (a) of Section 1054.1.
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