

STANISLAUS COUNTY SUPERIOR COURT
STATE OF CALIFORNIA

FILED

AUG 18 AM 10:54

CLERK OF THE SUPERIOR COURT
COUNTY OF STANISLAUS

BY Shirley J. Salazar
DEPUTY

THE PEOPLE OF THE STATE OF CALIFORNIA,)
)
 vs.)
)
FRANK CLIFFORD CARSON)
 [REDACTED])
)
BALJIT ATWAL)
 [REDACTED])
)
DALJIT ATWAL)
 [REDACTED])
)
WALTER WESTLEY WELLS)
 [REDACTED])
)
GEORGIA DEFILIPPO)
 [REDACTED])
)
CHRISTINA DEFILIPPO)
 [REDACTED])
)
EDUARDO QUINTANAR)
 [REDACTED])
)
SCOTT MCFARLANE)
 [REDACTED])
)
 DEFENDANT(S))
)
 No. 1490969)

COMPLAINT -- CRIMINAL

SO S1210194

State of California)
County of Stanislaus) ss.

MARLISA A. FERREIRA, OF THE STANISLAUS COUNTY DISTRICT ATTORNEY'S OFFICE, complains and alleges, upon information and belief that said defendant did commit the following crime in the County of Stanislaus, State of California.

COUNT I: On or about and between March 30, 2012 and March 31, 2012, defendants, **FRANK CLIFFORD CARSON, BALJIT ATWAL, DALJIT ATWAL, GEORGIA DEFILIPPO, CHRISTINA DEFILIPPO, and WALTER WESTLEY WELLS**, did commit a felony, MURDER, violation of Section 187(a) of the California Penal Code, in that the defendants did willfully, unlawfully, and feloniously and with malice aforethought murder **KOREY KAUFFMAN**, a human being.

AW
AV

SPECIAL ALLEGATION: It is further alleged as to count(s) I that the murder of **KOREY KAUFFMAN** was by defendants and that the defendants intentionally killed the victim while lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

COUNT II: On or about and between January, 2012 and March 3, 2014, defendants and co-conspirators, **FRANK CLIFFORD CARSON, BALJIT ATWAL, DALJIT ATWAL, ROBERT LEE WOODY, WALTER WESTLEY WELLS, GEORGIA DEFILIPPO, CHRISTINA DEFILIPPO, EDUARDO QUINTANAR, and SCOTT MCFARLANE,** did commit a felony, CONSPIRACY TO OBSTRUCT JUSTICE, violation of Section 182(a)(5) of the California Penal Code, in that the defendants did willfully, unlawfully, and feloniously and with other unidentified co-conspirators did conspire to obstruct justice and commit the following overt act(s) at and in the County of Stanislaus, State of California.

Each of the following overt acts was committed in order to further the defendants' agreement and conspiracy.

OVERT ACT NO. 1

That on or about February, 2012, defendant and co-conspirator, **FRANK CARSON,** did create and distribute a flier identifying and listing target criminals.

OVERT ACT NO. 2

That on or about and between October, 2011 and March, 2012, defendants and co-conspirators, **FRANK CARSON, CHRISTINA DEFILIPPO and GEORGIA DEFILIPPO,** agreed and conspired electronically to facilitate and promote the false imprisonment and assault with great bodily injury of unidentified persons found to be trespassing at 838 9th Street in the City of Turlock.

OVERT ACT NO. 3

That on or about and between February, 2012 and April, 2012, defendant and co-conspirator, **FRANK CARSON,** made threats to kill anyone found on his property to Michael Cooley.

OVERT ACT NO. 4

That on or about and between February, 2012 and March, 2012, defendant and co-conspirator, **FRANK CARSON,** and unidentified co-conspirators, made preparation by creating enticements on the property located at 838 9th Street in the City of Turlock.

OVERT ACT NO. 5

That on or about and between February, 2012 and March, 2012, defendant and co-conspirator, **FRANK CARSON,** solicited Ronald Cooper and Patrick Hampton to commit assault with great bodily injury on unidentified persons found to be trespassing at [REDACTED] in the City of Turlock.

OVERT ACT NO. 6

That on or about and between February, 2012 and March, 2012, defendant and co-conspirator, **FRANK CARSON**, induced **BALJIT ATWAL**, **DALJIT ATWAL**, and **ROBERT WOODY**, to be armed and surveil the property at [REDACTED] in the City of Turlock and falsely imprison and assault with intent to commit great bodily injury on any persons found to be on the property located at [REDACTED] in the City of Turlock.

OVERT ACT NO. 7

That on or about and between March 28, 2012 and March 29, 2012, defendant and co-conspirator, **FRANK CARSON**, induced **ROBERT WOODY** and **BALJIT ATWAL** to make death threats to victim **KOREY KAUFFMAN**.

OVERT ACT NO. 8

That on or about and between February, 2012 and April, 2012, defendants and co-conspirators, **FRANK CARSON**, **BALJIT ATWAL**, and **ROBERT WOODY**, conspired to have **BALJIT ATWAL's** truck stolen and burned to destroy evidence and to file a false insurance claim.

OVERT ACT NO. 9

That on or about and between February, 2012 to the present, defendant and co-conspirator, **FRANK CARSON**, induced co-conspirators to file complaints and civil suits in order to thwart and obstruct the investigation into the murder of **KOREY KAUFFMAN**.

OVERT ACT NO. 10

That on or about and between February, 2012 to the present, defendant and co-conspirator, **FRANK CARSON**, filed false accusations in criminal cases in Stanislaus County Superior Court in order to thwart and obstruct the investigation into the murder of **KOREY KAUFFMAN**.

OVERT ACT NO. 11

That on or about May 24, 2012, defendant and co-conspirator, **FRANK CARSON**, induced co-conspirators **BALJIT ATWAL** and **ROBERT WOODY** to threaten with death and/or great bodily injury **MICHAEL COOLEY**.

OVERT ACT NO. 12

That on or about and between July 15, 2012 to the present, defendants and co-conspirators, **EDUARDO QUINTANAR**, **WALTER WELLS**, and **SCOTT MCFARLANE**, agreed and conspired to obstruct justice by actively directing co-conspirators in investigative techniques used by law enforcement in an effort to thwart the investigation into the murder of **KOREY KAUFFMAN**.

OVERT ACT NO. 13

That on or about and between March 30, 2012 and April 16, 2012, defendant and co-conspirator, **WALTER WELLS**, actively and covertly engaged in deceitful acts while in possession of the phone belonging to **KOREY KAUFFMAN** in an effort to thwart the investigation into the murder of **KOREY KAUFFMAN**.

OVERT ACT NO. 14

On or about and between March, 2012 to the present, defendants and co-conspirators, **BALJIT ATWAL** and **DALJIT ATWAL**, paid \$4,000 for defendant and co-conspirator, **ROBERT WOODY**, to leave the jurisdiction so as not to be a witness/suspect.

OVERT ACT NO. 15

On or about and between March, 2012 to the present, defendants and co-conspirators, **BALJIT ATWAL** and **DALJIT ATWAL**, paid \$7,000 to \$10,000 for defendant and co-conspirator, **ROBERT WOODY**, to receive dental work so as to induce defendant not to cooperate with law enforcement.

OVERT ACT NO. 16

On or about and between March 2012 to present, co-conspirator, **ROBERT WOODY**, obtained an agreement from co-conspirators **FRANK CARSON**, **BALJIT ATWAL**, and **DALJIT ATWAL** that they would bail him out and **FRANK CARSON** would provide him with legal representation if defendant were arrested so as to induce defendant not to cooperate with law enforcement.

OVERT ACT NO. 17

On or about and between March, 2012 and August, 2013, co-conspirators, **BALJIT ATWAL AND ROBERT WOODY**, concealed and hid the body of **KOREY KAUFFMAN**, in an extremely remote area of the Stanislaus National Forest in Mariposa County in an effort to prevent and avoid detection.

COUNT III: On or about and between October 2011 to present, defendant(s), **CHRISTINA DEFILIPPO, EDUARDO QUINTANAR, AND SCOTT MCFARLANE** did commit a felony, ACCESSORY, violation of Section 32 of the California Penal Code, in that the defendant(s) did willfully, unlawfully, and feloniously, after a felony had been committed, harbor, conceal or aid, a principal in such felony with the intent that said principal may avoid or escape from the arrest, trial, conviction or punishment, having knowledge that said principal has committed such felony or has been charged with such felony or convicted thereof.

COUNT IV: On or about March 6, 2014, defendant, **FRANK CLIFFORD CARSON** did commit a felony, PERJURY, violation of Section 118(a) of the California Penal Code, in that the defendant(s) in a declaration under penalty of perjury in a case in which such declaration under penalty of perjury is permitted by law, did willfully and unlawfully state as true a material fact which *he knew to be false, to wit, MISREPRESENTATION ON FORM 700.

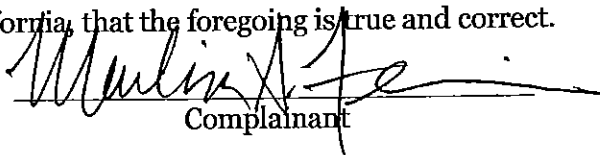
NOTICE: It is further alleged, pursuant to Penal Code Section 1170(h)(3) and 1170(f) that the defendant **FRANK CLIFFORD CARSON, BALJIT ATWAL, DALJIT ATWAL, WALTER WESTLEY WELLS, GEORGIA DEFILIPPO, CHRISTINA DEFILIPPO, EDUARDO QUINTANAR, and SCOTT MCFARLANE,** are not eligible to be sentenced to a term of imprisonment in the county jail on an executed sentence. This allegation is not subject to dismissal pursuant to Penal Code Section 1385.

DPH/dc/MAF/hp/MAF/rcs

All of which is contrary to law in such cases made and provided, and against the peace and dignity of the People of the State of California.

I certify under penalty of perjury, at Modesto, California, that the foregoing is true and correct.

Dated: 8/18/15


Complainant