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DA# 5496-15

6 IN THE SUPERIOR COURT OF CALIFORNIA
7 COUNTY OF MADERA
8 MADERA DIVISION

9
10 THE PEOPLE OF THE STATE OF
11 CALIFORNIA,

Plaintiff,

NO. MCR052752

12 vs.

FIRST AMENDED
CRIMINAL COMPLAINT

13 AMY LOUISE CHAVOYA,

14 Defendant.

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16 I, John Baker , state on information and belief, that defendant:

17 COUNT 1

18 AMY LOUISE CHAVOYA did, on or about October 10, 2014, in the County of Madera,
19 State of California, commit a FELONY, namely, violation of Section 187(a) of the Penal Code of the
20 State of California, in that the said defendant did unlawfully, and with malice aforethought murder
21 Mariah F., a human being.
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23 "NOTICE: Conviction of this offense will require you to provide specimens and samples
24 pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a
25 crime."
26

27 ENHANCEMENT

28 It is further alleged as to Count One, that the murder of Mariah F. was committed by AMY

LOUISE CHAVOYA while the said defendant was engaged in the commission of the crime of

1 torture, within the meaning of Penal Code sections 189 and 206.

2 SPECIAL CIRCUMSTANCE

3 It is further alleged as to Count One, that the murder of Mariah F. was committed by AMY
4 LOUISE CHAVOYA and that the murder was intentional and involved the infliction of torture,
5 within the meaning of Penal Code section 190.2(a)(18).
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7 COUNT 2

8 For a further and separate cause of action, being a different offense of the same class of
9 crimes and offenses as the charge set forth above, the said defendant AMY LOUISE CHAVOYA
10 did, on or about and between 2011 and October 2014, in the County of Madera, State of California,
11 commit a FELONY, namely, violation of Section 206 of the Penal Code of the State of California, in
12 that the said defendant did unlawfully and with the intent to cause cruel and extreme pain and
13 suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great
14 bodily injury, as defined in Penal Code section 12022.7, upon Mariah F., to wit: as a form of
15 punishment would deprive her of food, make her run around a tree for hours at a time, make her take
16 hot/scalding showers, stun her with a stun gun, make her stand with her face against the wall all
17 night long and would bang her head into the wall periodically with such force, causing holes in the
18 walls, and physically beat her.
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21 COUNT 3

22 For a further and separate cause of action, being a different offense of the same class of
23 crimes and offenses as the charge set forth above, the said defendant AMY LOUISE CHAVOYA
24 did, on or about and between 2011 and March 2015, in the County of Madera, State of California,
25 commit a FELONY, namely, violation of Section 206 of the Penal Code of the State of California, in
26 that the said defendant did unlawfully and with the intent to cause cruel and extreme pain and
27 suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great
28 bodily injury, as defined in Penal Code section 12022.7, upon Christopher F., to wit: as a form of

1 punishment would deprive him of food, make him run around a tree for hours at a time, make him
2 take hot/scalding showers, stun him with a stun gun, make him stand with his face against the wall
3 all night long and would periodically bang his head into the wall with such force, causing holes in
4 the walls, make him drink soap water, make him eat dishwasher soap pods, force him to cut himself
5 with a knife, stabbed him with a knife and physically beat him.

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7 COUNT 4

8 For a further and separate cause of action, being a different offense of the same class of
9 crimes and offenses as the charge set forth above, the said defendant AMY LOUISE CHAVOYA
10 did, on or about October 10, 2014, in the County of Madera, State of California, commit a FELONY,
11 namely, violation of Section 273a(a) of the Penal Code of the State of California, in that the said
12 defendant did unlawfully, under circumstances likely to produce great bodily harm and death, injure,
13 cause, and permit a child, Mariah F., to suffer and to be inflicted with unjustifiable physical pain and
14 mental suffering, and, having the care and custody of said child, injure, cause, and permit the person
15 and health of said child to be injured and did cause and permit said child to be placed in such
16 situation that her person and health was endangered.

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18 It is further alleged pursuant to section 12022.95 that the defendant, under circumstances and
19 conditions likely to produce great bodily harm and death, willfully caused and permitted a child to
20 suffer, and inflicted thereon unjustifiable physical pain and injury that resulted in death, and having
21 the care and custody of a child, under circumstances likely to produce great bodily harm and death,
22 willfully caused and permitted that child to be injured and harmed and that injury and harm resulted
23 in death.

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28 COUNT 5

1 For a further and separate cause of action, being a different offense of the same class of
2 crimes and offenses as the charge set forth above, the said defendant AMY LOUISE CHAVOYA
3 did, on or about and between December 1, 2012 and October 10, 2014, in the County of Madera,
4 State of California, commit a FELONY, namely, violation of Section 273a(a) of the Penal Code of
5 the State of California, in that the said defendant did unlawfully, under circumstances likely to
6 produce great bodily harm and death, injure, cause, and permit a child, Christopher F., to suffer and
7 to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and
8 custody of said child, injure, cause, and permit the person and health of said child to be injured and
9 did cause and permit said child to be placed in such situation that his person and health was
10 endangered.
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12 SPECIAL ALLEGATION - GREAT BODILY INJURY:
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14 It is further alleged as to Count Five that in the commission of the above offense the said
15 defendant AMY LOUISE CHAVOYA, personally inflicted great bodily injury upon Christopher F.,
16 not an accomplice to the above offense, within the meaning of Penal Code section 12022.7(a) and
17 also causing the above offense to become a serious felony within the meaning of Penal Code section
18 1192.7(c)(8).
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20 "NOTICE: This offense is a serious felony and a violent felony within the meaning of Penal
21 Code sections 1192.7(c)(8) and 667.5(c)(8)."
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23 COUNT 6
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25 For a further and separate cause of action, being a different offense of the same class of
26 crimes and offenses as the charge set forth above, the said defendant AMY LOUISE CHAVOYA
27 did, on or about and between February 20, 2015 and March 1, 2015, in the County of Madera, State
28 of California, commit a FELONY, namely, violation of Section 136.1(c)(1) of the Penal Code of the

1 State of California, in that the said defendant did willfully and unlawfully prevent and dissuade and
2 attempt to prevent and dissuade Christopher F., a person who was and who might be a witness from
3 reporting a suspected crime to a law enforcement agency, prosecuting agency, parole and
4 correctional officer, and judge, and from attending and giving testimony at a trial, proceeding and
5 inquiry authorized by law by means of force and threats of unlawful injury to person and damage to
6 property.

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8 COUNT 7

9 For a further and separate cause of action, being a different offense of the same class of
10 crimes and offenses as the charge set forth above, the said defendant AMY LOUISE CHAVOYA
11 did, on or about and between December 1, 2012 and October 10, 2014, in the County of Madera,
12 State of California, commit a MISDEMEANOR, namely, violation of Section 273a(b) of the Penal
13 Code of the State of California, in that the said defendant did willfully and unlawfully, under
14 circumstances other than those likely to produce great bodily harm and death, cause a child, Manuel
15 F. a minor, to suffer and did inflict unjustifiable physical pain and mental suffering on said child
16 and, having care and custody of said child, did permit the health of said child to be endangered.

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18 COUNT 8

19 For a further and separate cause of action, being a different offense of the same class of
20 crimes and offenses as the charge set forth above, the said defendant AMY LOUISE CHAVOYA
21 did, on or about and between December 1, 2012 and October 10, 2014, in the County of Madera,
22 State of California, commit a MISDEMEANOR, namely, violation of Section 273a(b) of the Penal
23 Code of the State of California, in that the said defendant did willfully and unlawfully, under
24 circumstances other than those likely to produce great bodily harm and death, cause a child, Lily F. a
25 minor, to suffer and did inflict unjustifiable physical pain and mental suffering on said child and,
26 having care and custody of said child, did permit the health of said child to be endangered.
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1 Willful violation of this subdivision by an attorney is a MISDEMEANOR. For purposes of
2 this section, all names included in the attached reports are deemed to be witnesses pursuant to
3 subdivision (a) of Section 1054.1.
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