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SAN JOAQUIN COUNTY  
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8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN  
9

10 ) No TP09-2712  
The People of the State of California, ) SP Case  
11 ) DA Case: COM 0612329  
Plaintiff, )  
12 ) AMENDED  
v. ) COMPLAINT  
13 )  
MELISSA HUCKABY )  
14 aka MELISSA CHANTEL HUCKABY )  
aka MELISSA CHANTEL LAWLESS )  
15 )  
16 Defendant(s).)  
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17  
18 I, the undersigned, say, on information and belief, that in  
19 the County of SAN JOAQUIN, State of California:  
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21 PC 187 MURDER  
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22 COUNT: 001, On or about 03/27/2009 the crime of MURDER, in  
23 violation of Section 187 of the Penal Code, a FELONY, was  
24 committed by MELISSA HUCKABY, who at the time and place last  
25 aforesaid, did willfully and unlawfully and intentionally and  
26 with malice aforethought murder SANDRA CANTU, a human being.  
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1 PC 190.2(A)(17)(B) SPECIAL CIRCUMSTANCE: KIDNAPPING  
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2 It is further alleged that the murder of SANDRA CANTU, was  
3 committed by defendant MELISSA HUCKABY, while the said defendant  
4 was ENGAGED IN THE COMMISSION OF the crime of Kidnapping in  
5 violation of penal code section 207 and 209.  
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7 PC 190.2(A)(17)(E) SPECIAL CIRCUMSTANCE: LEWD OR LASCIVIOUS  
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8 It is further alleged that the murder of SANDRA CANTU, was  
9 committed by MELISSA HUCKABY, while the said defendant(s)  
10 was/were engaged in the commission, attempted commission, or  
11 immediate flight after the commission, or attempted commission,  
12 of the crime of the performance of lewd or lascivious acts upon  
13 the person of a child under the age 14 in violation of Penal  
14 Code Section 288; within the meaning of Penal Code Section  
15 190.2(a)(17)(E).  
16

17 PC 190.2(A)(17)(K) SPECIAL CIRCUMSTANCE: RAPE BY FOREIGN OBJECT  
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18 It is further alleged that the murder of SANDRA CANTU, was  
19 committed by MELISSA HUCKABY, while the said defendant(s)  
20 was/were engaged in the commission, attempted commission, or  
21 immediate flight after the commission, or attempted commission,  
22 of the crime of the rape by instrument in violation of Penal  
23 Code Section 289; within the meaning of Penal Code Section  
24 190.2(a)(17)(K).  
25

26 PC 273a(a) CHILD ENDANGERMENT  
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27 COUNT: 002, 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, 001, complainant further complains  
2 and says: On or about 01/17/2009 the crime of CHILD  
3 ENDANGERMENT, in violation of Section 273a(a) of the Penal Code,  
4 a FELONY, was committed by MELISSA HUCKABY, who at the time and  
5 place last aforesaid, having the care and custody of a child,  
6 JANE M. DOE (DOB: 07/05/01), did willfully and unlawfully injure,  
7 cause and permit the person and health of said child to be  
8 injured and did willfully cause and permit said child to be  
9 placed in such a situation that his/her person and health was  
10 endangered.

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15 PC 347(A)(1) FURNISHING A HARMFUL SUBSTANCE  
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16 COUNT: 003, 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 002, complainant further complains  
19 and says: On or about 01/17/2009, the crime of FURNISHING A  
20 HARMFUL SUBSTANCE, IN VIOLATION OF Section 347(a)(1) of the  
21 Penal Code of the State of California, County of San Joaquin to  
22 wit; a FELONY, was committed by MELISSA HUCKABY, who at the  
23 time and place last aforesaid, did willfully and unlawfully  
24 mingle a harmful substance with food or drink with the intent  
25 that the same be taken by a human being, to wit JANE M. DOE  
26 (DOB: 07/05/01), to the injury of the human being.

1 PC 347(A)(1) FURNISHING A HARMFUL SUBSTANCE  
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2 COUNT: 004, for a further and separate cause of complaint, being  
3 a different offense from but connected in its commission with  
4 the charge set forth in Count 003, complainant further complains  
5 and says: On or about 03/02/2009, the crime of FURNISHING A  
6 HARMFUL SUBSTANCE, IN VIOLATION OF Section 347(a)(1) of the  
7 Penal Code of the State of California, County of San Joaquin to  
8 wit; a FELONY, was committed by MELISSA HUCKABY, who at the  
9 time and place last aforesaid, did willfully and unlawfully  
10 mingle a harmful substance with food or drink with the intent  
11 that the same be taken by a human being, to wit DANIEL PLOWMAN,  
12 to the injury of the human being.

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14 If the above-named defendant(s) is/are presently on probation in  
15 San Joaquin County, any evidence presented at a preliminary  
16 hearing in the instant case will be used not only as a basis for  
17 a holding order in this case but also as evidence of a violation  
18 of probation and, at any formal hearing on that violation of  
19 probation, the People will move the transcript of the preliminary  
20 hearing into evidence as a basis for the violation.

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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.

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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 05/21/09, at STOCKTON, California.

11 Thomas Festa, DDA  
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