

4/24/17(MAF)
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Martinez/Carlton/Hejertsson/Rein

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Michelle Woerner
MICHELLE WOERNER
CLERK

STANISLAUS COUNTY SUPERIOR COURT
STATE OF CALIFORNIA

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D.A. No. 1490969

THE PEOPLE OF THE STATE OF CALIFORNIA)
)
) Plaintiff,)

No.1490969

vs.

) INFORMATION FOR
) THE FOLLOWING CHARGE
) APPLIES TO FRANK CLIFFORD
) CARSON, BALJIT ATWAL, &
) DALJIT ATWAL:
) MURDER, COUNT I:
) VIOLATION OF §187(a) OF
) THE CALIFORNIA PENAL
) CODE, FELONY

FRANK CLIFFORD CARSON,
(DOB: 6/29/54)
BALJIT ATWAL,
(DOB: 3/1/78)
DALJIT ATWAL,
(DOB: 1/26/73)
WALTER WESTLEY WELLS,
(DOB: 12/2/81)

Defendant.

) THE FOLLOWING CHARGE
) APPLIES TO ALL
) DEFENDANTS:
) CONSPIRACY TO OBSTRUCT
) JUSTICE, COUNT II:
) VIOLATION OF §182(a)(5)
) OF THE CALIFORNIA PENAL
) CODE, FELONY

) THE FOLLOWING CHARGE
) APPLIES TO WALTER
) WESTLEY WELLS ONLY:
) ACCESSORY, COUNT III:
) VIOLATION OF §32 OF THE
) CALIFORNIA PENAL CODE,
) FELONY

) THE FOLLOWING CHARGE
) APPLIES TO FRANK CLIFFORD
) CARSON ONLY:
) PERJURY, COUNT IV:
) VIOLATION OF §118(a) OF
) THE CALIFORNIA PENAL
) CODE, FELONY

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1 **FRANK CLIFFORD CARSON, BALJIT ATWAL, DALJIT ATWAL, AND WALTER**
2 **WESTLEY WELLS** are accused by the District Attorney for the said
3 County of Stanislaus, State of California, by this Information, of
4 the crimes of: THE FOLLOWING CHARGE APPLIES TO FRANK CLIFFORD
5 CARSON, BALJIT ATWAL, AND DALJIT ATWAL: COUNT I: Violation of
6 Section 187(a) of the California Penal Code, felony, THE FOLLOWING
7 CHARGES APPLY TO ALL DEFENDANTS: COUNT II: Violation of Section
8 182(a)(5) of the California Penal Code, felony, THE FOLLOWING
9 CHARGE APPLIES TO WALTER WESTLEY WELLS ONLY: COUNT III: Violation
10 of Section 32 of the California Penal Code, felony, THE FOLLOWING
11 CHARGE APPLIES TO FRANK CLIFFORD CARSON: COUNT IV: Violation of
12 Section 118(a) of the California Penal Code, felony committed as
13 follows:

14 COUNT I: The said **FRANK CLIFFORD CARSON, BALJIT ATWAL, DALJIT**
15 **ATWAL** on or about and between March 30, 2012 and March 31, 2012,
16 at and in the County of Stanislaus, State of California, and prior
17 to filing of this Information, did willfully, unlawfully, and
18 feloniously and with malice aforethought murder **KOREY KAUFFMAN**, a
19 human being.

20 It is further alleged that the defendant(s) acted
21 intentionally, deliberately and with premeditation.

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

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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 838 9th Street 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 838 9th Street 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 838 9th Street in the City of Turlock.

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OVERT ACT NO. 7

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

5 OVERT ACT NO. 8

6 That on or about and between February, 2012 and April, 2012,
7 defendants and co-conspirators, **FRANK CARSON**, **BALJIT ATWAL**, and
8 **ROBERT WOODY**, conspired to have **BALJIT ATWAL's** truck stolen and
9 burned to destroy evidence and to file a false insurance claim.
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11 OVERT ACT NO. 9

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

16 OVERT ACT NO. 10

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

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OVERT ACT NO. 11

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

5 OVERT ACT NO. 12

6 That on or about and between July 15, 2012 to the present,
7 defendants and co-conspirators, **EDUARDO QUINTANAR**, **WALTER WELLS**,
8 and **SCOTT MCFARLANE**, agreed and conspired to obstruct justice by
9 actively directing co-conspirators in investigative techniques used
10 by law enforcement in an effort to thwart the investigation into
11 the murder of **KOREY KAUFFMAN**.
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13 OVERT ACT NO. 13

14 That on or about and between March 30, 2012 and April 16, 2012,
15 defendant and co-conspirator, **WALTER WELLS**, actively and covertly
16 engaged in deceitful acts while in possession of the phone belonging
17 to **KOREY KAUFFMAN** in an effort to thwart the investigation into the
18 murder of **KOREY KAUFFMAN**.
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20 OVERT ACT NO. 14

21 On or about and between March, 2012 to the present, defendants and
22 co-conspirators, **BALJIT ATWAL** and **DALJIT ATWAL**, paid \$4,000 for
23 defendant and co-conspirator, **ROBERT WOODY**, to leave the
24 jurisdiction so as not to be a witness/suspect.
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OVERT ACT NO. 15

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2 On or about and between March, 2012 to the present, defendants and
3 co-conspirators, **BALJIT ATWAL** and **DALJIT ATWAL**, paid \$7,000 to
4 \$10,000 for defendant and co-conspirator, **ROBERT WOODY**, to receive
5 dental work so as to induce defendant not to cooperate with law
6 enforcement.

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OVERT ACT NO. 16

8 On or about and between March 2012 to present, co-conspirator,
9 **ROBERT WOODY**, obtained an agreement from co-conspirators **FRANK**
10 **CARSON**, **BALJIT ATWAL**, and **DALJIT ATWAL** that they would bail him out
11 and **FRANK CARSON** would provide him with legal representation if
12 defendant were arrested so as to induce defendant not to cooperate
13 with law enforcement.
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OVERT ACT NO. 17

16 On or about and between March, 2012 and August, 2013, co-
17 conspirators, **BALJIT ATWAL AND ROBERT WOODY**, concealed and hid the
18 body of **KOREY KAUFFMAN**, in an extremely remote area of the
19 Stanislaus National Forest in Mariposa County in an effort to
20 prevent and avoid detection.
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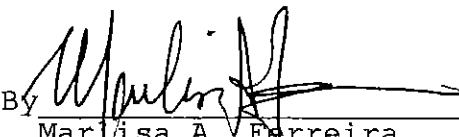
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1 **COUNT III:** The said **WALTER WESTLEY WELLS** on or about and
2 between October 2011 to present, at and in the County of Stanislaus,
3 State of California, and prior to filing of this Information, did
4 willfully, unlawfully, and feloniously, after a felony had been
5 committed, harbor, conceal or aid, a principal in such felony with
6 the intent that said principal may avoid or escape from the arrest,
7 trial, conviction or punishment, having knowledge that said
8 principal has committed such felony or has been charged with such
9 felony or convicted thereof.

10 **COUNT IV:** The said **FRANK CLIFFORD CARSON** on or about the 6th
11 day of March, 2014, at and in the County of Stanislaus, State of
12 California, and prior to filing of this Information, in a
13 declaration under penalty of perjury in a case in which such
14 declaration under penalty of perjury is permitted by law, did
15 willfully and unlawfully state as true a material fact which they
16 knew to be false, to wit, MISREPRESENTATION ON FORM 700.

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18
19 Dated this 20th day of April, 2017.

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21 BIRGIT FLADAGER
22 District Attorney
23 Stanislaus County,
24 State of California

25 By 
26 Marlisa A. Ferreira
27 Chief Deputy District Attorney

28 MAF/rcs