

THE SUPERIOR COURT, STATE OF CALIFORNIA
For the County of Santa Barbara
Figueroa Division

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

MAR 29 2016

Darrel E. Parker, Executive Officer

BY S. Villalta, Deputy Clerk

THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff,

vs.

PIERRE F HAOSHS

DOB: 12/12/1989

Defendant.

DA No. 16-03-377740

Court No. 1494152

FELONY COMPLAINT

AB109 INELIGIBLE

The undersigned is informed and believes that:

COUNT 1

On or about March 23, 2016, in the County of Santa Barbara, the crime of **FIRST DEGREE MURDER**, in violation of **PENAL CODE SECTION 187(a)**, a Felony, was committed by PIERRE F HAOSHS, who did unlawfully and with malice aforethought murder WEIDONG (HENRY) H., a human being. It is further alleged that the above offense was **WILLFUL, PREMEDITATED, and DELIBERATE, OR COMMITTED BY MEANS OF LYING IN WAIT** pursuant to **Penal Code Section 189**.

It is further alleged that the above offense is a serious felony within the meaning of **Penal Code Section 1192.7(c)(1)**.

It is further alleged that the above offense is a violent felony pursuant to **Penal Code Section 667.5(c)(1)**.

**SPECIAL CIRCUMSTANCE
MURDER FOR FINANCIAL GAIN**

It is further alleged that the murder of WEIDONG (HENRY) H. was intentional and was committed by the defendant for financial gain, within the meaning of **PENAL CODE SECTION 190.2(a)(1)**.

**SPECIAL CIRCUMSTANCE
MULTIPLE MURDER**

It is further alleged that the offense(s) charged in count(s) 1 is a special circumstance indicating a multiple murder that is within the meaning of **PENAL CODE SECTION 190.2(a)(3)**.

**SPECIAL CIRCUMSTANCE
SPEC ALLEG-PERSONAL AND INTENTIONAL DISCHARGE OF A FIREARM, GBI**

It is further alleged that in the commission of the foregoing offense, the defendant PIERRE F HAOSHS, intentionally and personally discharged a firearm, to wit: a handgun, and proximately caused great bodily injury, as defined in Penal Code Section 12022.7, or death, to a person other than an accomplice, to wit: WEIDONG (HENRY) H within the meaning of Section 12022.53(d) of the Penal Code.

COUNT 2

On or about March 23, 2016, in the County of Santa Barbara, the crime of **FIRST DEGREE MURDER**, in violation of **PENAL CODE SECTION 187(a)**, a Felony, was committed by PIERRE F HAOSHS, who did unlawfully and with malice aforethought murder HUIJIE (JENNIE) Y., a human being. It is further alleged that the above offense was **WILLFUL, PREMEDITATED, and DELIBERATE, OR COMMITTED BY MEANS OF LYING IN WAIT** pursuant to Penal Code Section 189.

It is further alleged that the above offense is a serious felony within the meaning of **Penal Code Section 1192.7(c)(1)**.

It is further alleged that the above offense is a violent felony pursuant to **Penal Code Section 667.5(c)(1)**.

SPECIAL CIRCUMSTANCE MURDER FOR FINANCIAL GAIN

It is further alleged that the murder of HUIJIE (JENNIE) Y. was intentional and was committed by the defendant for financial gain, within the meaning of **PENAL CODE SECTION 190.2(a)(1)**.

SPECIAL CIRCUMSTANCE MULTIPLE MURDER

It is further alleged that the offense(s) charged in count(s) 2 is a special circumstance indicating a multiple murder that is within the meaning of **PENAL CODE SECTION 190.2(a)(3)**.

SPEC ALLEG-PERSONAL AND INTENTIONAL DISCHARGE OF A FIREARM, GBI

It is further alleged that in the commission of the foregoing offense, the defendant PIERRE F HAOSHS, intentionally and personally discharged a firearm, to wit: a handgun, and proximately caused great bodily injury, as defined in Penal Code Section 12022.7, or death, to a person other than an accomplice, to wit: HUIJIE (JENNIE) Y. within the meaning of Section 12022.53(d) of the Penal Code.

COUNT 3

On or about March 23, 2016, in the County of Santa Barbara, the crime of **FIRST DEGREE MURDER**, in violation of **PENAL CODE SECTION 187(a)**, a Felony, was committed by PIERRE F HAOSHS, who did unlawfully and with malice aforethought murder MINOR CHILD, AGE 5 (DOB 3-26-10), a human being. It is further alleged that the above offense was **WILLFUL, PREMEDITATED, and DELIBERATE, OR COMMITTED BY MEANS OF LYING IN WAIT** pursuant to Penal Code Section 189.

It is further alleged that the above offense is a serious felony within the meaning of **Penal Code Section 1192.7(c)(1)**.

It is further alleged that the above offense is a violent felony pursuant to Penal Code Section 667.5(c)(1).

**SPECIAL CIRCUMSTANCE
MURDER FOR FINANCIAL GAIN**

It is further alleged that the murder of MINOR CHILD, AGE 5 (DOB 3-26-10) was intentional and was committed by the defendant for financial gain, within the meaning of PENAL CODE SECTION 190.2(a)(1).

**SPECIAL CIRCUMSTANCE
MULTIPLE MURDER**

It is further alleged that the offense(s) charged in count(s) 3 is a special circumstance indicating a multiple murder that is within the meaning of PENAL CODE SECTION 190.2(a)(3).

**SPECIAL CIRCUMSTANCE
SPEC ALLEG-PERSONAL AND INTENTIONAL DISCHARGE OF A FIREARM, GBI**

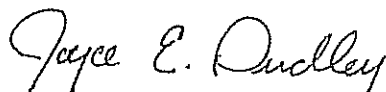
It is further alleged that in the commission of the foregoing offense, the defendant PIERRE F HAOBESH, intentionally and personally discharged a firearm, to wit: a handgun, and proximately caused great bodily injury, as defined in Penal Code Section 12022.7, or death, to a person other than an accomplice, to wit: MINOR CHILD, AGE 5 (DOB 3-26-10) within the meaning of Section 12022.53(d) of the Penal Code.

* * * * *

Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 4 COUNT(S).

Executed at Santa Barbara, California, on March 28, 2016.



HILARY DOZER
BENJAMIN LADINIG
DEPUTY DISTRICT ATTORNEYS

Agency: GOSO

<u>DEFENDANT NAME</u>	<u>SEX</u>	<u>RACE</u>	<u>HGT</u>	<u>WGT</u>	<u>EYES</u>	<u>HAIR</u>	<u>DRIVER'S LICENSE</u>	<u>STS</u>	<u>COURT DATE</u>
Pierre F Haobsh	M	W	511	155	HZL	BRO	D058173341	IC	03/29/2016