

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
EAST COUNTY DIVISION**

THE PEOPLE OF THE STATE OF CALIFORNIA, <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> LETICIA DIANE MCCORMACK, <i>dob 05/27/73;</i> ADELLA JUANITA TOM, <i>dob 12/24/51;</i> STANLEY TOM, <i>dob 06/06/47;</i> <p style="text-align: right;">Defendants</p>	CT No. CE414848 DA No. MCA199 CHILD ABUSE 2ND AMENDED COMPLAINT-FELONY
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CT No. CE414848
DA No. MCA199

CHILD ABUSE
2ND AMENDED
COMPLAINT-FELONY

INFORMATION Date: _____

PC296 DNA TEST STATUS SUMMARY

Defendant	DNA Testing Requirements
MCCORMACK, LETICIA DIANE	DNA sample required upon conviction
TOM, ADELLA JUANITA	DNA sample required upon conviction
TOM, STANLEY	DNA sample required upon conviction

CHARGE SUMMARY

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
1	PC187(a) MCCORMACK, LETICIA DIANE TOM, ADELLA JUANITA TOM, STANLEY	Felony	25 Yrs-Life		
2	PC182(a)(1) MCCORMACK, LETICIA DIANE TOM, ADELLA JUANITA TOM, STANLEY	Felony	Check Code		
3	PC206 MCCORMACK, LETICIA DIANE	Felony	Life		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
3	PC206 TOM, ADELLA JUANITA TOM, STANLEY	Felony	Life		
4	PC206 MCCORMACK, LETICIA DIANE TOM, ADELLA JUANITA TOM, STANLEY	Felony	Life		
5	PC206 MCCORMACK, LETICIA DIANE TOM, ADELLA JUANITA TOM, STANLEY	Felony	Life		
6	PC273a(a) MCCORMACK, LETICIA DIANE TOM, ADELLA JUANITA TOM, STANLEY	Felony	2-4-6	PC12022.95 PC12022.95 PC12022.95	+4 Yrs +4 Yrs +4 Yrs
7	PC273a(a) MCCORMACK, LETICIA DIANE TOM, ADELLA JUANITA TOM, STANLEY	Felony	2-4-6	PC12022.7(a) PC12022.7(a) PC12022.7(a)	+3 Yrs +3 Yrs +3 Yrs
8	PC273a(a) MCCORMACK, LETICIA DIANE TOM, ADELLA JUANITA TOM, STANLEY	Felony	2-4-6	PC12022.7(a) PC12022.7(a) PC12022.7(a)	+3 Yrs +3 Yrs +3 Yrs

PC1054.3

INFORMAL REQUEST FOR DISCOVERY

The undersigned, certifying upon information and belief, complains that in the County of San Diego, State of California, the Defendant(s) did commit the following crime(s):

CHARGES

COUNT 1 - MURDER

On or about August 30, 2022, LETICIA DIANE MCCORMACK, ADELLA JUANITA TOM, and STANLEY TOM did unlawfully murder ARABELLA M. (age 11), a human being, in violation of PENAL CODE SECTION 187(a).

COUNT 2 - CONSPIRACY TO COMMIT A CRIME

On or about and between February 26, 2019 and August 30, 2022, LETICIA DIANE MCCORMACK, ADELLA JUANITA TOM, and STANLEY TOM did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Penal Code section 206, torture, in violation of PENAL CODE SECTION 182(a)(1).

The defendants LETICIA MCCORMACK, ADELLA TOM and STANLEY TOM and co-conspirator BRIAN MCCORMACK are familial related. Over the court of several years, it is alleged the defendants and co-conspirator BRIAN MCCORMACK worked as a team to create an environment of torment, pain, suffering, violence, and fear for LETICIA MCCORMACK and BRIAN MCCORMACK'S adopted children: Arabella M., Alexandria M., and Emilyn M., which resulted in the great bodily injury of Alexandria M. and Emilyn M. and death of Arabella M.

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

OVERT ACTS:

1. On or about February 26, 2019, Defendant STANLEY TOM, deprived Arabella M. from using the bathroom.
2. On or about February 26, 2019, Defendant STANLEY TOM, forced Arabella M. to engage in physical exertion.
3. On or about February 26, 2019, Defendant ADELLA TOM, forced Alexandria M. to engage in physical exertion.
4. On or about February 26, 2019, Defendant STANLEY TOM, deprived Arabella M. from using the bathroom.
5. On or about May 15, 2019, Defendant LETICIA MCCORMACK, instructed co-conspirator BRIAN MCCORMACK to deprive Alexandria M. of sleep.
6. On or about May 15, 2019, Defendant LETICIA MCCORMACK, instructed co-conspirator BRIAN MCCORMACK to engage Alexandria M. in physical exertion to keep her awake.
7. On or about May 24, 2019, co-conspirator BRIAN MCCORMACK, told Arabella M. to "shut your mouth" and forced her not to speak.
8. On or about May 24, 2019, Defendant STANLEY TOM, suggested to co-conspirator and Defendant LETICIA MCCORMACK that Alexandria M. needs a "cold shower."
9. On or about June 1, 2019, co-conspirator BRIAN MCCORMACK, deprived Alexandria M. from using the bathroom.
10. On or about June 1, 2019, Defendant LETICIA MCCORMACK, forced a child to engage in physical exertion.
11. On or about June 1, 2019, Defendant LETICIA MCCORMACK, promoted isolation of children by instructing co-conspirator and Defendant ADELLA TOM to keep children from "interacting" with others at the park.
12. On or about June 4, 2019, Defendants LETICIA MCCORMACK, STANLEY TOM, and ADELLA TOM, deprived Arabella M. from using the bathroom causing her to urinate on herself.
13. On or about June 27, 2019, Defendant LETICIA MCCORMACK, instructed co-conspirator BRIAN MCCORMACK to punish Arabella M. because Arabella M. told Alexandria M. it was "time to get up because the sun was out."
14. On or about June 27, 2019, Defendant STANLEY TOM, forced Arabella M. to lie still in her bed.

CHARGES (cont'd)

15. On or about June 28, 2019, co-conspirator BRIAN MCCORMACK, deprived a child from using the bathroom causing her pain.
16. On or about June 29, 2019, Defendant LETICIA MCCORMACK, forced children to engage in physical exertion.
17. On or about June 29, 2019, Defendant ADELLA TOM deprived Emilyn M. of food.
18. On or about July 13, 2019, Defendant LETICIA MCCORMACK AND co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
19. On or about July 15, Defendant STANLEY TOM, communicated co-conspirator and Defendant LETICIA MCCORMACK'S threats to deprive Alexandria M. of food for not standing up.
20. On or about July 25, 2019, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant STANLEY TOM to deprive Arabella M. from using the bathroom.
21. On or about August 16, 2019, co-conspirator BRIAN MCCORMACK, forced Arabella M. to engage in physical exertion.
22. On or about August 17, 2019, Defendant LETICIA MCCORMACK, struck a child with a paddle.
23. On or about August 17, 2019, Defendant STANLEY TOM, informed co-conspirator and Defendant LETICIA MCCORMACK that co-conspirator and Defendant ADELLA TOM has another paddle.
24. On or about August 17, 2019, Defendant LETICIA MCCORMACK, texted and warned co-conspirators and Defendants STANLEY TOM and ADELLA TOM that the laws are "murkier" as to whether a nonparent can spank a child and indicated it is a "good thing" they have "tinted windows on the van."
25. On or about August 17, 2019, Defendant STANLEY TOM, acknowledged co-conspirator and Defendant LETICIA MCCORMACK's text messages about child abuse laws.
26. On or about August 27, 2019, co-conspirator BRIAN MCCORMACK, forced Arabella M. to engage in physical exertion.
27. On or about August 30, 2019, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, forced Arabella M. to sit in a manner that causes her pain.
28. On or about September 8, 2019, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
29. On or about September 9, 2019, Defendant LETICIA MCCORMACK, threatened Alexandria M. by stating she would punish her the same as Arabella M. and told Alexandria M. "she will not like it."
30. On or about September 16, 2019, Defendant STANLEY TOM, communicated co-conspirator and Defendant LETICIA MCCORMACK'S threats to Arabella M. that she would be spanked if she does not stand up.
31. On or about September 16, 2019, co-conspirator BRIAN MCCORMACK, spanked Arabella M. for not standing up when directed to do so by co-conspirators and Defendants STANLEY TOM and ADELLA TOM.
32. On or about September 27, 2019, co-conspirator BRIAN MCCORMACK, spanked Alexandria M.
33. On or about September 27, 2019, co-conspirator BRIAN MCCORMACK, jerked the bedsheets from under Alexandria M.
34. On or about September 29, 2019, Defendant LETICIA MCCORMACK, isolated Alexandria M. in her bedroom.
35. On or about October 4, 2019, Defendant LETICIA MCCORMACK, isolated Arabella M. in her bedroom.
36. On or about October 9, 2019, Defendant LETICIA MCCORMACK, deprived children from using the bathroom causing them to urinate themselves.
37. On or about October 20, 2019, co-conspirator BRIAN MCCORMACK, forced Arabella M. to engage in physical exertion.
38. On or about November 8, 2019, co-conspirator BRIAN MCCORMACK, isolated Arabella M. in her bedroom.
39. On or about November 8, 2019, co-conspirator BRIAN MCCORMACK, isolated Alexandria M. in her bedroom.

CHARGES (cont'd)

40. On or about November 15, 2019, Defendants STANLEY TOM and ADELLA TOM, forced a child to engage in physical exertion.
41. On or about November 19, 2019, co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate herself.
42. On or about November 19, 2019, co-conspirator BRIAN MCCORMACK, forced Arabella M. to sit in her own urine.
43. On or about November 19, 2019, co-conspirator BRIAN MCCORMACK, spanked Alexandria M.
44. On or about November 26, 2019, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate herself.
45. On or about November 28, 2019, Defendant LETICIA MCCORMACK, forced a child to engage in physical exertion.
46. On or about December 8, 2019, co-conspirator BRIAN MCCORMACK, deprived Alexandria M. from using the bathroom.
47. On or about December 8, 2019, co-conspirator BRIAN MCCORMACK, struck Arabella M.
48. On or about December 8, 2019, co-conspirator BRIAN MCCORMACK, isolated Alexandria M.
49. On or about December 10, 2019, co-conspirator BRIAN MCCORMACK, deprived Alexandria M. of food.
50. On or about December 15, 2019, co-conspirator BRIAN MCCORMACK, isolated children.
51. On or about December 17, 2019, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, forced Arabella M. to lie down on her ear for so long that it became “nasty, red and splotchy.”
52. On or about December 17, 2019, Defendant LETICIA MCCORMACK, deprived Arabella M. of food.
53. On or about December 18, 2019, Defendant LETICIA MCCORMACK, attempted to force Arabella M. to engage in physical exertion.
54. On or about December 18, 2019, Defendants STANLEY TOM and ADELLA TOM, attempted to force Arabella M. to engage in physical exertion.
55. On or about December 18, 2019, Defendant LETICIA MCCORMACK, deprived Arabella M. of food.
56. On or about December 19, 2019, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, forced Arabella M. to engage in physical exertion.
57. On or about December 31, 2019, Defendant LETICIA MCCORMACK, instructed co-conspirator BRIAN MCCORMACK to force Arabella M. to engage in physical exertion.
58. On or about January 1, 2020, Defendant LETICIA MCCORMACK, forced Arabella M. to engage in physical exertion.
59. On or about January 1, 2017, to January 7, 2020, co-conspirator BRIAN MCCORMACK, physically abused a child causing significant bruising.
60. On or about January 9, 2020, co-conspirator BRIAN MCCORMACK, spanked Emily M. with a belt causing bruising.
61. On or about January 16, 2020, co-conspirator BRIAN MCCORMACK spanked Emily M.
62. On or about January 16, 2020, co-conspirator BRIAN MCCORMACK deprived Alexandria M. from using the bathroom causing her to urinate on herself.
63. On or about January 17, 2020, Defendant LETICIA MCCORMACK, instructed co-conspirator BRIAN MCCORMACK to isolate Alexandria M. in her room.
64. On or about January 18, 2020, Defendant LETICIA MCCORMACK, told co-conspirator BRIAN MCCORMACK the children claim he doesn't “spank them hard anymore.”
65. On or about January 17, 2020 to January 25, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
66. On or about January 22, 2020, co-conspirator BRIAN MCCORMACK deprived Arabella M. of water.

CHARGES (cont'd)

67. On or about January 22, 2020, co-conspirator BRIAN MCCORMACK deprived Arabella M. from using the bathroom causing her to defecate on herself.
68. On or about January 22, 2020, Defendant ADELLA TOM, deprived Emilyn M. of using the bathroom.
69. On or about February 4, 2020, Defendant LETICIA MCCORMACK, slapped Arabella M. in the face.
70. On or about February 4, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. of food.
71. On or about February 9, 2020, Defendants STANLEY TOM and ADELLA TOM, isolated children in their bedrooms for hours.
72. On or about February 11, 2020, co-conspirator BRIAN MCCORMACK spanked and smacked Emilyn M.
73. On or about February 14, 2020, Defendant LETICIA MCCORMACK, forced Arabella M. to engage in physical exertion.
74. On or about February 25, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
75. On or about February 25, 2020, Defendant LETICIA MCCORMACK, forced Arabella M. to sit in her own urine.
76. On or about March 13, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from food and nutrition.
77. On or about March 19, 2020, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
78. On or about March 19, 2020, Defendant LETICIA MCCORMACK, forced Arabella M. to sit in her own urine.
79. On or about March 19, 2020, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish Arabella M. for urinating herself.
80. On or about March 19, 2020, co-conspirator BRIAN MCCORMACK spanked Emilyn M.
81. On or about March 22, 2020, co-conspirator BRIAN MCCORMACK deprived Arabella M. from using the bathroom.
82. On or about March 29, 2020, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to defecate on herself.
83. On or about April 5, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
84. On or about May 11, 2020, Defendant LETICIA MCCORMACK, forced Alexandria M. to engage in physical exertion.
85. On or about May 19, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
86. On or about May 19, 2020, Defendant LETICIA MCCORMACK, forced Arabella M. to sit in her own urine.
87. On or about May 28, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
88. On or about May 30, 2020, co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
89. On or about June 1, 2020, Defendant LETICIA MCCORMACK, forced Alexandria M. to engage in physical exertion.
90. On or about June 1, 2020, Defendant LETICIA MCCORMACK, forced Arabella M. to engage in physical exertion.
91. On or about June 21, 2020, Defendants LETICIA MCCORMACK and ADELLA TOM, forced Alexandria M. and Arabella M. engage in physical exertion.
92. On or about June 26, 2020, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.

CHARGES (cont'd)

93. On or about June 26, 2020, Defendant LETICIA MCCORMACK, texted and instructed co-conspirator BRIAN MCCORMACK to punish Alexandria M. for urinating on herself.
94. On or about July 2, 2020, Defendant LETICIA MCCORMACK, deprived a child from using the bathroom causing the child to urinate on herself.
95. On or about July 5, 2020, co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
96. On or about July 15, 2020, Defendants STANLEY TOM and ADELLA TOM, forced a child to engage in physical exertion.
97. On or about July 24, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
98. On or about July 25, 2020, Defendant LETICIA MCCORMACK, deprived a child from using the bathroom causing the child to urinate on herself.
99. On or about July 24, 2020 to July 25, 2020, Defendant LETICIA MCCORMACK, forced a child to sit in her own urine.
100. On or about August 6, 2020, Defendant LETICIA MCCORMACK, deprived a child from using the bathroom causing the child to urinate on herself.
101. On or about August 12, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
102. On or about August 14, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
103. On or about August 14, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. of food.
104. On or about August 15, 2020, co-conspirator BRIAN MCCORMACK deprived Arabella M. from using the bathroom causing her to urinate on herself.
105. On or about August 18, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom.
106. On or about August 22, 2020, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived a child from using the bathroom causing the child to urinate on herself.
107. On or about September 9, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
108. On or about September 9, 2020, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
109. On or about September 9, 2020, Defendant LETICIA MCCORMACK, deprived Emilyn M. from using the bathroom causing her to urinate on herself.
110. On or about September 10, 2020, co-conspirator BRIAN MCCORMACK deprived Alexandria M. from using the bathroom causing her to urinate on herself.
111. On or about or before September 19, 2020, Defendant LETICIA MCCORMACK AND CO-CONSPIRATOR BRIAN MCCORMACK, installed a bed alarm on Arabella M.'s bed.
112. On or about September 20, 2020, Defendant LETICIA MCCORMACK, forced Arabella M. to handwash her urine-soaked clothing.
113. On or about September 20, 2020, Defendant ADELLA TOM, deprived Arabella M. of food.
114. On or about September 20, 2020, Defendant ADELLA TOM, refused to allow Arabella M. to wash urine off of her hands.
115. On or about October 2, 2020, Defendant LETICIA MCCORMACK texted and told co-conspirator BRIAN MCCORMACK not to feed a child "right away" as punishment.
116. On or about October 2, 2020, co-conspirator BRIAN MCCORMACK agreed to deprive Arabella M. of food.

CHARGES (cont'd)

117. On or about October 2, 2020, Defendant LETICIA MCCORMACK, deprived Alexandria M. of food.
118. On or about October 2, 2020, Defendant LETICIA MCCORMACK, deprived Emily M. of food.
119. On or about October 4, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
120. On or about October 4, 2020, co-conspirator BRIAN MCCORMACK, forced Arabella M. to sit in her own urine.
121. On or about October 8, 2020, Defendant LETICIA MCCORMACK texted and instructed co-conspirator BRIAN MCCORMACK to punish Arabella M. for moving in bed.
122. On or about October 10, 2020 and October 11, 2020, Defendant LETICIA MCCORMACK, forced Arabella M. to handwash her clothing.
123. On or about October 18, 2020, an unknown co-conspirator deprived Arabella M. from using the bathroom causing her to urinate on herself.
124. On or about October 18, 2020, Defendant LETICIA MCCORMACK collaborated with co-conspirator and Defendant ADELLA TOM, about how to best force Arabella M. to handwash her urine-soaked clothing.
125. On or about October 18, 2020, Defendant ADELLA TOM, helped to force Arabella M. handwash her urine-soaked clothing.
126. On or about October 20, 2020, Defendant STANLEY TOM, deprived Alexandria M. from using the bathroom.
127. On or about October 25, 2020, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
128. On or about October 25, 2020, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, forced Arabella M. to sit in her own urine.
129. On or about October 29, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
130. On or about October 29, 2020, Defendant LETICIA MCCORMACK, forced Arabella M. to handwash her urine-soaked clothing.
131. On or about October 30, 2020, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
132. On or about November 4, 2020, co-conspirator BRIAN MCCORMACK spanked Alexandria M.
133. On or about November 5, 2020, co-conspirator BRIAN MCCORMACK spanked Arabella M.
134. On or about November 5, 2020, co-conspirator BRIAN MCCORMACK and Defendant LETICIA MCCORMACK, texted and collaborated about how many spankings Arabella M. will receive for being “terrible and defiant.”
135. On or about November 5, 2020, Defendant ADELLA TOM, struck Arabella M. in the face.
136. On or about November 19, 2020, Defendant ADELLA TOM, imposed a rule that a child must chew a bite of cereal 23 times.
137. On or about November 22, 2020, Defendant LETICIA MCCORMACK, deprived Arabella M. of food.
138. On or about December 1, 2020, Defendant LETICIA MCCORMACK, texted and instructed co-conspirator BRIAN MCCORMACK to give Arabella M. an “ass beating she will not forget” for eating potato salad in the garage.
139. On or about December 1, 2020, an unknown co-conspirator struck Arabella M. with a paddle causing injury.
140. On or about December 1, 2020, co-conspirator BRIAN MCCORMACK, deprived Arabella M. of food.
141. On or about December 1, 2020, co-conspirator BRIAN MCCORMACK, forced Arabella M. to put on dirty clothing.
142. On or about December 1, 2020, co-conspirator BRIAN MCCORMACK, forced Arabella M. not to speak.
143. On or about or before December 16, 2020, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK installed a door alarm on Alexandria M. and Arabella M.’s bedroom door.

CHARGES (cont'd)

144. On or about or before December 16, 2020, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK installed a motion alarm in the hallway outside of Alexandria M. and Arabella M.'s bedroom door.
145. On or about December 18, 2020, Defendant LETICIA MCCORMACK, isolated Arabella M. in her bedroom.
146. On or about December 18, 2020, Defendants LETICIA MCCORMACK, STANLEY TOM, and ADELLA TOM, deprived Arabella M. from using the bathroom causing her to urinate on herself.
147. On or about December 19, 2020, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, forced Alexandria M. to lie on her ear for so long it caused sores to form.
148. On or about December 24, 2020, co-conspirator BRIAN MCCORMACK, texted and advised co-conspirator and Defendant LETICIA MCCORMACK that Arabella M. kicked her leg in bed.
149. On or about January 3, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
150. On or about January 3, 2021 to January 4, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom.
151. On or about January 4, 2021, Defendant LETICIA MCCORMACK, forced Arabella M. to engage in physical exertion.
152. On or about January 4, 2021, Defendant LETICIA MCCORMACK, forced Arabella M. to handwash her urine-soaked clothing.
153. On or about January 11, 2021 to January 12, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, failed to get Arabella M. medical care.
154. On or about January 13, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
155. On or about January 13, 2021, Defendant ADELLA TOM, deprived Alexandria M. from using the bathroom.
156. On or about January 17, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Emily M. from using the bathroom causing her to urinate on herself.
157. On or about January 17, 2021, Defendant LETICIA MCCORMACK, forced Emily M. to sit in her own urine.
158. On or about January 28, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
159. On or about January 29, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
160. On or about January 29, 2021, Defendant LETICIA MCCORMACK, forced Arabella M. to handwash her urine-soaked clothing.
161. On or about January 29, 2021, Defendant LETICIA MCCORMACK, forced Arabella M. to choose between eating food and going to the bathroom.
162. On or about February 1, 2021, Defendant LETICIA MCCORMACK, texted and informed co-conspirator BRIAN MCCORMACK that "the belt doesn't hurt" when a child is wearing a pull-up and "only if you get her legs does she really feel it."
163. On or about February 1, 2021, co-conspirator BRIAN MCCORMACK acknowledged he is to remove a child's pull-up before spankings.
164. On or about February 5, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
165. On or about February 5, 2021, Defendant LETICIA MCCORMACK, isolated Arabella M. in her bedroom.
166. On or about February 5, 2021, Defendant LETICIA MCCORMACK, forced Arabella M. to choose between eating food and going to the bathroom.
167. On or about February 7, 2021, Defendant LETICIA MCCORMACK, ordered new cameras to place in the children's bedrooms.

CHARGES (cont'd)

168. On or about February 9, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, locked children in their bedrooms.
169. On or about February 11, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish Arabella M. for moving in bed and setting off the bed alarm.
170. On or about February 15, 2021 to February 16, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
171. On or about February 16, 2021, Defendant LETICIA MCCORMACK, isolated Arabella M. in her bedroom.
172. On or about February 19, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. of food.
173. On or about February 19, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, failed to get Arabella M. medical care.
174. On or about February 20, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
175. On or about February 20, 2021, Defendant LETICIA MCCORMACK, punished Arabella M. for urinating on herself.
176. On or about February 22, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to defecate on herself.
177. On or about February 22, 2021, Defendant LETICIA MCCORMACK, forced Arabella M. to handwash her clothing.
178. On or about March 7, 2021, Defendant LETICIA MCCORMACK, texted and instructed co-conspirator BRIAN MCCORMACK to “start spanking [the kids] every time they set off an alarm.”
179. On or about March 7, 2021, co-conspirator BRIAN MCCORMACK agreed to spank children although he believed it would not change their behavior.
180. On or about March 16, 2021, Defendant LETICIA MCCORMACK, texted and instructed co-conspirator BRIAN MCCORMACK to punish a child for setting off alarms.
181. On or about March 19, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived a child from using the bathroom causing her to urinate on herself.
182. On or about March 19, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, forced a child to sit in their own urine.
183. On or about March 19, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived another child from using the bathroom causing her to urinate on herself.
184. On or about March 19, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, forced another child to sit in their own urine.
185. On or about March 19, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Arabella M. of food.
186. On or about March 19, 2021, Defendant LETICIA MCCORMACK, texted and instructed co-conspirator BRIAN MCCORMACK to punish Arabella M. for urinating herself.
187. On or about March 19, 2021, Defendant LETICIA MCCORMACK, texted and instructed co-conspirator BRIAN MCCORMACK to punish Arabella M. for moving and setting off an alarm.
188. On or about March 21, 2021 and March 22, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
189. On or about March 23, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. of food.
190. On or about March 31, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
191. On or about March 31, 2021, co-conspirator BRIAN MCCORMACK, spanked Arabella M.

CHARGES (cont'd)

192. On or about April 3, 2021, Defendant LETICIA MCCORMACK, deprived children of using the bathroom for seven hours.
193. On or about April 9, 2021, Defendant LETICIA MCCORMACK, deprived Emilyn M. of sleep.
194. On or about April 9, 2021, co-conspirator BRIAN MCCORMACK deprived Arabella M. from using the bathroom causing her to urinate on herself.
195. On or about April 9, 2021, co-conspirator BRIAN MCCORMACK forced Arabella M. to sit in her own urine.
196. On or about April 13, 2021, Defendant LETICIA MCCORMACK, forced Arabella M. to handwash her clothing.
197. On or about April 13, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. of food.
198. On or about April 17, 2021, Defendant LETICIA MCCORMACK, isolated Arabella M.
199. On or about April 19, 2021, co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
200. On or about April 22, 2021, Defendant LETICIA MCCORMACK, deprived children of food.
201. On or about April 22, 2021, co-conspirator BRIAN MCCORMACK, spanked Alexandria M. 30 times.
202. On or about April 26, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
203. On or about April 26, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK, not to let Arabella M. “wipe down” after she urinated herself.
204. On or about May 1, 2021, co-conspirator BRIAN MCCORMACK, deprived a child from using the bathroom.
205. On or about May 27, 2021, Defendant LETICIA MCCORMACK, deprived a child from using the bathroom causing the child to urinate on herself.
206. On or about May 28, 2021, co-conspirator BRIAN MCCORMACK, deprived children of water.
207. On or about June 25, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK, to punish Alexandria M. if she moves or opens her eyes.
208. On or about July 18, 2021, co-conspirator BRIAN MCCORMACK, deprived Alexandria M. of food.
209. On or about July 20, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. of a chair at the table.
210. On or about July 21, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK, to not let the children brush their teeth at night.
211. On or about July 21, 2021, Defendant LETICIA MCCORMACK texted and ensured with co-conspirator BRIAN MCCORMACK, that Emilyn was punished for tying her shorts to her crib.
212. On or about July 26, 2021, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
213. On or about July 26, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator BRIAN MCCORMACK to deprive the children of milk so they will not have to go to the bathroom.
214. On or about August 14, 2021, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to defecate in the shower.
215. On or about August 20, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator BRIAN MCCORMACK to punish Alexandria M. for moving.
216. On or about August 20, 2021, co-conspirator BRIAN MCCORMACK punished Alexandria M. for moving.
217. On or about August 20, 2021, Defendant LETICIA MCCORMACK, forced Alexandria M. to engage in physical exertion.
218. On or about August 20, 2021, Defendant LETICIA MCCORMACK, forced Alexandria M. to handwash her clothing.
219. On or about August 23, 2021, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.

CHARGES (cont'd)

220. On or about September 4, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
221. On or about September 11, 2021, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
222. On or about September 13, 2021, co-conspirator BRIAN MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
223. On or about September 13, 2021, co-conspirator BRIAN MCCORMACK, deprived Alexandria M. and Arabella M. of food.
224. On or about September 13, 2021, co-conspirator BRIAN MCCORMACK, spanked children.
225. On or about September 22, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to deprive Alexandria M. from using the bathroom.
226. On or about September 22, 2021, Defendant ADELLA TOM, deprived Alexandria M. from using the bathroom.
227. On or about September 24, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to only allow children to use the bathroom “if no one has peed themselves.”
228. On or about September 24, 2021, Defendant LETICIA MCCORMACK, deprived Emily M. from using the bathroom causing her to urinate on herself.
229. On or about September 25, 2021, Defendant ADELLA TOM, punished a child for no reason.
230. On or about September 27, 2021, co-conspirator BRIAN MCCORMACK, deprived children from using the bathroom.
231. On or about September 27, 2021, Defendant ADELLA TOM, forced Alexandria M. and Arabella M. to engage in physical exertion.
232. On or about September 28, 2021, Defendant ADELLA TOM, forced Alexandria M. to engage in physical exertion.
233. On or about October 2, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to engage children in physical exertion.
234. On or about October 3, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to deprive Emily M. from using the bathroom.
235. On or about October 3, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to threaten Emily M. that if she urinates herself she “will be in big trouble.”
236. On or about October 5, 2021, Defendant ADELLA TOM, forced Alexandria M. and Arabella M. to engage in physical exertion.
237. On or about October 6, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to engage children in physical exertion.
238. On or about October 6, 2021, Defendant ADELLA TOM, forced Alexandria M. and Arabella M. to engage in physical exertion.
239. On or about October 7, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
240. On or about October 8, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator BRIAN MCCORMACK to deprive Arabella M. from using the bathroom.
241. On or about October 5, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
242. On or about October 10, 2021, co-conspirator BRIAN MCCORMACK, deprived children of food.
243. On or about October 10, 2021, Defendant ADELLA TOM, forced Arabella M. to stretch for three hours.
244. On or about October 11, 2021, Defendants and co-conspirators STANLEY TOM and ADELLA TOM, forced Arabella M. to stretch causing pain.

CHARGES (cont'd)

245. On or about October 12, 2021, Defendant ADELLA TOM, forced Alexandria M. and Arabella M. to engage in physical exertion.
246. On or about October 13, 2021, Defendants ADELLA TOM and STANLEY TOM, deprived a child from using the bathroom causing the child to urinate herself.
247. On or about October 13, 2021, Defendant ADELLA TOM, forced Alexandria M. to engage in physical exertion.
248. On or about October 14, 2021, co-conspirator BRIAN MCCORMACK, punished Alexandria M. for “arching” while in bed.
249. On or about October 14, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to engage Arabella M. in physical exertion.
250. On or about October 14, 2021, Defendant ADELLA TOM, forced Alexandria M. and Arabella M. to engage in physical exertion.
251. On or about October 14, 2021, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
252. On or about October 14, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator BRIAN MCCORMACK, to isolate Arabella M. in her room.
253. On or about October 14, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator BRIAN MCCORMACK, to punish Alexandria M. for setting off an alarm.
254. On or about October 14, 2021, co-conspirator BRIAN MCCORMACK, forced Alexandria M. and Arabella M. to engage in physical exertion.
255. On or about October 16, 2021, Defendant ADELLA TOM, forced Alexandria M. and Arabella M. to engage in physical exertion.
256. On or about October 18, 2021, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
257. On or about October 18, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
258. On or about October 18, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to engage a child in physical exertion.
259. On or about October 18, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
260. On or about October 19, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Alexandria M. from using the bathroom for five hours causing her to urinate on herself.
261. On or about or before October 19, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator BRIAN MCCORMACK to deprive children from using the bathroom unless she is home.
262. On or about October 19, 2021, Defendant LETICIA MCCORMACK, deprived a child from using the bathroom for seven hours.
263. On or about October 19, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to engage Arabella M. in physical exertion.
264. On or about October 19, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
265. On or about October 19, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to engage Alexandria M. in physical exertion and to specifically “decrease the exercises she does easily” and “increase the ones she struggles with.”
266. On or about October 19, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirators and Defendants STANLEY TOM to threaten Alexandria M. with losing her dinner, being punished, and climbing more stairs.

CHARGES (cont'd)

267. On or about October 19, 2021, Defendant STANLEY TOM, forced Alexandria M. to engage in physical exertion.
268. On or about October 23, 2021, Defendant LETICIA MCCORMACK, forced Alexandria M. to engage in physical exertion.
269. On or about October 23, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to engage Alexandria M. in physical exertion.
270. On or about October 24, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirators and Defendants STANLEY TOM and ADELLA TOM to deprive Emilyn M. of using the bathroom.
271. On or about October 24, 2021, Defendant ADELLA TOM, forced Arabella M. and Alexandria M. to engage in physical exertion.
272. On or about October 25, 2021, co-conspirator BRIAN MCCORMACK, forced Alexandria M. to engage in physical exertion.
273. On or about October 25, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirators and Defendants STANLEY TOM and ADELLA TOM to tell Emilyn M. to “shut up” after being caught talking in her bedroom.
274. On or about October 25, 2021, Defendant ADELLA TOM, told Emilyn to “shut up” as instructed.
275. On or about October 25, 2021, Defendant ADELLA TOM, forced Alexandria M. and Arabella M. to engage in physical exertion.
276. On or about October 26, 2021, co-conspirator BRIAN MCCORMACK deprived a child from using the bathroom.
277. On or about October 26, 2021, co-conspirator BRIAN MCCORMACK, spanked Alexandria M. “black and blue” while “hoping she would STFU”.
278. On or about October 26, 2021, co-conspirator BRIAN MCCORMACK, forced a child to engage in physical exertion.
279. On or about October 26, 2021, co-conspirator BRIAN MCCORMACK, deprived a child of food.
280. On or about October 26, 2021, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant ADELLA TOM to engage Arabella M. and Alexandria M. in physical exertion.
281. On or about October 26, 2021, Defendant ADELLA TOM, forced Alexandria M. and Arabella M. to engage in physical exertion.
282. On or about October 27, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
283. On or about October 28, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
284. On or about October 28, 2021, Defendant STANLEY TOM, forced Alexandria M. to engage in physical exertion.
285. On or about October 28, 2021, Defendant LETICIA MCCORMACK deprived Arabella M. from using the bathroom.
286. On or about October 28, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM to engage Arabella M. in physical exertion.
287. On or about October 28, 2021, Defendant LETICIA MCCORMACK forced Arabella M. to engage in physical exertion.
288. On or about October 28, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. of water while engaged in physical exertion.
289. On or about October 28, 2021, Defendant STANLEY TOM, forced Alexandria M. to engage in physical exertion.
290. On or about October 29, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.

CHARGES (cont'd)

291. On or about October 29, 2021, co-conspirator BRIAN MCCORMACK, failed to interfere while Arabella M. was being forced to engage in physical exertion and “looking pretty pale” with co-conspirators and Defendants STANLEY TOM and ADELLA TOM.
292. On or about October 30, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
293. On or about October 31, 2021, co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
294. On or about October 31, 2021, co-conspirator BRIAN MCCORMACK, forced Arabella M. to “soak up her piss” with paper towels.
295. On or about October 31, 2021, an unknown co-conspirator deprived Arabella M. from using the bathroom causing her to urinate on herself another time.
296. On or about October 31, 2021, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage children in physical exertion.
297. On or about October 31, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion despite her screams for help and that “it hurts.”
298. On or about November 1, 2021, Defendant ADELLA TOM, dragged Alexandria M. down the stairs by her arm.
299. On or about November 1, 2021, Defendant ADELLA TOM, forced Alexandria M. and Arabella M. to engage in physical exertion.
300. On or about November 1, 2021, an unknown co-conspirator struck Alexandria M. with a paddle.
301. On or about November 1, 2021, co-conspirator BRIAN MCCORMACK texted co-conspirator and Defendant STANLEY TOM to “please quiet everything down a little” because they “have neighbors close to that window.”
302. On or about November 2, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK forced Alexandria M. to engage in physical exertion.
303. On or about November 2, 2021, Defendant LETICIA MCCORMACK threatened to deprive Alexandria M. of dinner if she did not do exercises.
304. On or about November 2, 2021, Defendants ADELLA TOM and STANLEY TOM, forced Alexandria M. to engage in physical exertion.
305. On or about November 2, 2021, Defendants ADELLA TOM and STANLEY TOM, deprived Alexandria M. from using the bathroom.
306. On or about November 3, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
307. On or about November 4, 2021, co-conspirator BRIAN MCCORMACK, spanked Alexandria M. to get her to “shut up.”
308. On or about November 4, 2021, Defendant ADELLA TOM, forced Alexandria M. to engage in physical exertion.
309. On or about November 5, 2021, Defendant ADELLA TOM, forced Alexandria M. to engage in physical exertion.
310. On or about November 5, 2021, Defendant STANLEY TOM, screamed at Arabella M. for making noise.
311. On or about November 6, 2021, Defendant LETICIA MCCORMACK deprived a child from using the bathroom.
312. On or about November 6, 2021, Defendant LETICIA MCCORMACK forced a child to engage in physical exertion.
313. On or about November 6, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
314. On or about November 8, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM the manner in which a child must eat their cereal, specifically: “half a bowl”, “half a cup of milk”, “no milk on her spoonfuls”, “drink her milk at the end.”

CHARGES (cont'd)

315. On or about November 8, 2021, Defendant ADELLA TOM, forced Arabella M. and Alexandria M. to engage in physical exertion.
316. On or about November 9, 2021, Defendants ADELLA TOM and STANLEY TOM, forced a child to engage in physical exertion.
317. On or about November 9, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish Arabella M. for “cheating” on her exercises.
318. On or about November 9, 2021, co-conspirator BRIAN MCCORMACK forced Arabella M. to engage in physical exertion.
319. On or about November 9, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
320. On or about November 10, 2021, Defendant STANLEY TOM, forced Arabella M. to lie on the floor.
321. On or about November 10, 2021, Defendant ADELLA TOM, attempted to force Arabella M. to engage in physical exertion.
322. On or about November 11, 2021, Defendant ADELLA TOM, forced Arabella M. and Alexandria M. to engage in physical exertion.
323. On or about November 11, 2021, Defendant ADELLA TOM, deprived Arabella M. and Emily M. of water.
324. On or about November 11, 2021, co-conspirator BRIAN MCCORMACK deprived Alexandria M. from using the bathroom causing her to urinate herself.
325. On or about November 12, 2021, Defendants ADELLA TOM and STANLEY TOM, forced Arabella M. to engage in physical exertion.
326. On or about November 14, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to deprive Alexandria M. of food after she engaged in physical exertion.
327. On or about November 14, 2021, Defendant STANLEY TOM forced Alexandria M. to engage in physical exertion.
328. On or about November 14, 2021, Defendant STANLEY TOM deprived Alexandria M. of food after she engaged in physical exertion.
329. On or about November 14, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
330. On or about November 15, 2021, co-conspirator BRIAN MCCORMACK forced Arabella M. to engage in physical exertion.
331. On or about November 15, 2021, co-conspirator BRIAN MCCORMACK punished Emily M. for placing her blanket and pillow outside of her crib.
332. On or about November 15, 2021, Defendant STANLEY TOM, forced Alexandria M. to engage in physical exertion.
333. On or about November 15, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
334. On or about November 16, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
335. On or about November 16, 2021, Defendant ADELLA TOM, imposed a rule that Arabella M. must flatten her thumbs on the spoon while eating.
336. On or about November 17, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM to engage Alexandria M. in physical exertion.
337. On or about November 17, 2021, Defendants ADELLA TOM and STANLEY TOM, forced Arabella M. and Alexandria M. to engage in physical exertion.
338. On or about November 18, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM to engage Arabella M. in physical exertion.

CHARGES (cont'd)

339. On or about November 18, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
340. On or about November 22, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK that Alexandria M. “can do the stairs wet unless she is dripping.”
341. On or about November 22, 2021, Defendants ADELLA TOM and STANLEY TOM, forced Arabella M. to engage in physical exertion.
342. On or about November 23, 2021, Defendant LETICIA MCCORMACK forced a child to engage in physical exertion.
343. On or about November 23, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. in physical exertion.
344. On or about November 23, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM to engage a child in physical exertion.
345. On or about November 23, 2021, Defendant STANLEY TOM, forced a child to engage in physical exertion.
346. On or about November 23, 2021, co-conspirator BRIAN MCCORMACK deprived a child from using the bathroom.
347. On or about November 24, 2021, Defendant LETICIA MCCORMACK, isolated Arabella M.
348. On or about November 24, 2021, Defendants STANLEY TOM and ADELLA TOM, deprived a child from using the bathroom causing her to urinate on herself.
349. On or about November 24, 2021, Defendants STANLEY TOM and ADELLA TOM, forced Arabella M. to engage in physical exertion.
350. On or about November 29, 2021, Defendant ADELLA TOM, slapped a child or children.
351. On or about December 13, 2021, Defendant ADELLA TOM, forced a child to engage in physical exertion.
352. On or about December 14, 2021, Defendant ADELLA TOM, forced Arabella M. and Alexandria M. to engage in physical exertion.
353. On or about December 17, 2021, Defendants STANLEY TOM and ADELLA TOM, forced Arabella M. to engage in physical exertion.
354. On or about December 18, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish Emilyn for “demanding to be fed.”
355. On or about December 18, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
356. On or about December 18, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. in physical exertion.
357. On or about December 18, 2021, Defendants STANLEY TOM and ADELLA TOM, forced Arabella M. and Alexandria M. to engage in physical exertion.
358. On or about December 18, 2021, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
359. On or about December 19, 2021, Defendant LETICIA MCCORMACK, deprived a child from using the bathroom causing the child to urinate on herself.
360. On or about December 19, 2021, Defendant LETICIA MCCORMACK forced a child to engage in physical exertion.
361. On or about December 19, 2021, Defendants STANLEY TOM and ADELLA TOM, forced Arabella M. and Alexandria M. to engage in physical exertion.
362. On or about December 19, 2021, Defendants STANLEY TOM and ADELLA TOM, isolated Emilyn M.
363. On or about December 22, 2021, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Arabella M. and Alexandria M. in physical exertion.

CHARGES (cont'd)

364. On or about December 23, 2021, Defendants STANLEY TOM and ADELLA TOM, forced Arabella M. to engage in physical exertion.
365. On or about December 23, 2021, Defendants STANLEY TOM and ADELLA TOM, deprived Arabella M. of using the bathroom.
366. On or about December 26, 2021, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Arabella M. and Alexandria M. in physical exertion.
367. On or about December 26, 2021, Defendant ADELLA TOM, forced Arabella M. to engage in physical exertion.
368. On or about December 28, 2021, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
369. On or about December 29, 2021, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Arabella M. of medical care.
370. On or about December 29, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. in physical exertion.
371. On or about December 29, 2021, Defendants STANLEY TOM engaged Arabella M. and Alexandria M. to engage in physical exertion.
372. On or about December 31, 2021, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM, to engage Arabella M. and Alexandria M. in physical exertion.
373. On or about January 3, 2022, Defendant LETICIA MCCORMACK gave permission to co-conspirator and Defendant STANLEY TOM, to deprive Arabella M. of food.
374. On or about January 3, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM, to engage Arabella M. and Alexandria M. in physical exertion.
375. On or about January 3, 2022, Defendants STANLEY TOM forced Alexandria M. to engage in physical exertion.
376. On or about January 4, 2022, Defendants STANLEY TOM forced Alexandria M. and Arabella M. to engage in physical exertion.
377. On or about January 6, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM, to engage Arabella M. and Alexandria M. in physical exertion.
378. On or about January 7, 2022, Defendant STANLEY TOM forced a child or children to engage in physical exertion.
379. On or about January 8, 2022, Defendant LETICIA MCCORMACK, punished children for setting off an alarm.
380. On or about January 8, 2022, Defendants STANLEY TOM forced Alexandria M. and Arabella M. to engage in physical exertion.
381. On or about January 9, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to “push” Alexandria M. to stretch beyond what she has stretched before.
382. On or about January 13, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage children in physical exertion.
383. On or about January 13, 2022, Defendant LETICIA MCCORMACK isolated Emilyn in her bedroom.
384. On or about January 13, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, that Emilyn must sit still and “no talking.”
385. On or about January 13, 2022, co-conspirator BRIAN MCCORMACK instructed co-conspirator and Defendant LETICIA MCCORMACK to lock the children’s door.
386. On or about January 18, 2022, Defendant STANLEY TOM forced Alexandria M. and Arabella M. to lie still in bed.

CHARGES (cont'd)

387. On or about January 22, 2022, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
388. On or about January 22, 2022, Defendant LETICIA MCCORMACK, texted and informed her co-conspirators she “broke the other stick” and purchased 10 new sticks from Lowes.
389. On or about January 22, 2022, Defendant ADELLA TOM, encouraged a bulk purchase of sticks by Leticia.
390. On or about January 23, 2022, Defendants STANLEY TOM and ADELLA TOM went to Lowes for the purpose of purchasing more yardsticks.
391. On or about January 23, 2022, Defendant STANLEY TOM forced Alexandria M. and Arabella M. to engage in physical exertion.
392. On or about January 24, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish Arabella M. and then force her to engage in physical exertion.
393. On or about January 24, 2022, co-conspirator BRIAN MCCORMACK forced Arabella M. and Alexandria M. to engage in physical exertion.
394. On or about January 24, 2022, co-conspirator BRIAN MCCORMACK, threatened to follow Arabella M. up and down the stairs with a stick.
395. On or about January 24, 2022, co-conspirator BRIAN MCCORMACK, struck Alexandria M. with a paddle.
396. On or about January 24, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to be touch on Arabella M. and give her “no chances” while she eats her cereal – specifically “her spoon should not be heaping” and “should be almost level.”
397. On or about January 25, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
398. On or about January 25, 2022, Defendant STANLEY TOM forced Alexandria M. and Arabella M. to engage in physical exertion.
399. On or about January 25, 2022 to January 27, 2022 Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK deprived Arabella M. of water.
400. On or about January 26, 2022, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
401. On or about January 26, 2022, Defendant LETICIA MCCORMACK, forced Arabella M. to engage in physical exertion while wearing wet clothes and plastic bags.
402. On or about January 26, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish Arabella M. for failing to exercise correctly.
403. On or about January 26, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to deprive Arabella M. of food.
404. On or about January 26, 2022, co-conspirator BRIAN MCCORMACK deprived Arabella M. of food.
405. On or about January 26, 2022, Defendant STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
406. On or about January 27, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to deprive Arabella M. of food.
407. On or about January 27, 2022, co-conspirator BRIAN MCCORMACK deprived Alexandria M. from using the bathroom while knowing she will “likely pee herself.”
408. On or about January 27, 2022, Defendant LETICIA MCCORMACK encouraged co-conspirator BRIAN MCCORMACK to punish Arabella M. with a stick.
409. On or about January 27, 2022, Defendant STANLEY TOM forced Arabella M. to engage in physical exertion.
410. On or about January 30, 2022, Defendant STANLEY TOM forced Arabella M. to engage in physical exertion.

CHARGES (cont'd)

411. On or about January 30, 2022, Defendant ADELLA TOM instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. in physical exertion.
412. On or about or before January 31, 2022, Defendant LETICIA MCCORMACK, imposed a time-limit for Arabella M. to eat.
413. On or about or before January 31, 2022, co-conspirator BRIAN MCCORMACK, smacked Arabella M. for “overloading” her utensil and “looking around” while eating.
414. On or about or before January 31, 2022, co-conspirator BRIAN MCCORMACK, forced Alexandria M. to engage in physical exertion.
415. On or about January 31, 2022, Defendant STANLEY TOM forced Alexandria M. to engage in physical exertion.
416. On or about February 1, 2022, Defendant STANLEY TOM forced a child to engage in physical exertion.
417. On or about or before February 3, 2022, co-conspirator BRIAN MCCORMACK, forced a child to eat with a baby spoon.
418. On or about or before February 3, 2022, co-conspirator BRIAN MCCORMACK, deprived Arabella M. of food after exceeding her time-limit.
419. On or about February 3, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. and Arabella M. in physical exertion.
420. On or about February 3, 2022, Defendant STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
421. On or about February 4, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. and Arabella M. in physical exertion.
422. On or about February 5, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
423. On or about February 5, 2022, Defendant STANLEY TOM forced Arabella M. to engage in physical exertion.
424. On or about February 6, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. and Arabella M. in physical exertion.
425. On or about February 6, 2022, Defendant STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
426. On or about February 7, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. and Arabella M. in physical exertion.
427. On or about February 7, 2022, Defendant STANLEY TOM forced a child or children to engage in physical exertion.
428. On or about February 8, 2022, Defendant STANLEY TOM forced a child or children to engage in physical exertion.
429. On or about February 11, 2022, Defendants ADELLA TOM and STANLEY TOM forced Arabella M. to engage in physical exertion.
430. On or about February 12, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to deprive Arabella M. of food.
431. On or about February 12, 2022, Defendant STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
432. On or about February 13, 2022, Defendant STANLEY TOM forced Arabella M. to engage in physical exertion.
433. On or about February 14, 2022, Defendant LETICIA MCCORMACK, deprived Arabella M. of food.
434. On or about February 14, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK To deprive Arabella M. of food.

CHARGES (cont'd)

435. On or about February 14, 2022, co-conspirator BRIAN MCCORMACK deprived Arabella M. of food.
436. On or about February 14, 2022, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
437. On or about February 14, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. and Arabella M. in physical exertion.
438. On or about February 14, 2022, Defendant STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
439. On or about February 16, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK To deprive Arabella M. of food.
440. On or about February 17, 2022, Defendant STANLEY TOM, deprived Arabella M. of food.
441. On or about February 18, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. and Arabella M. in physical exertion.
442. On or about February 18, 2022, Defendant STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
443. On or about February 19, 2022, Defendant LETICIA MCCORMACK, forced Alexandria M. to engage in physical exertion.
444. On or about February 19, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. and Arabella M. in physical exertion.
445. On or about February 19, 2022, Defendant STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
446. On or about February 20, 2022, Defendant LETICIA MCCORMACK, forced a child to engage in physical exertion.
447. On or about February 20, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
448. On or about February 21, 2022, Defendant STANLEY TOM forced Alexandria M. to engage in physical exertion.
449. On or about February 22, 2022, Defendant STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
450. On or about February 23, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. and Arabella M. in physical exertion.
451. On or about February 23, 2022, Defendant STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
452. On or about February 24, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM not to allow Arabella M. to clean urine off herself.
453. On or about February 24, 2022, Defendant STANLEY TOM deprived Arabella M. from using the bathroom causing her to urinate on herself.
454. On or about February 25, 2022, Defendant STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
455. On or about February 26, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
456. On or about February 26, 2022, Defendants STANLEY TOM and ADELLA TOM forced Arabella M. to engage in physical exertion.
457. On or about February 26, 2022, Defendant STANLEY TOM struck Arabella M. in the face with books.
458. On or about February 26, 2022, Defendant ADELLA TOM pulled up Arabella M.'s legs, spanked her, grabbed her by the ear and hair, and backhanded her.

CHARGES (cont'd)

459. On or about February 27, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage children in physical exertion.
460. On or about February 28, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to deprive Arabella M. of food.
461. On or about February 28, 2022, Defendant STANLEY TOM deprived Arabella M. of food.
462. On or about March 1, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. in physical exertion.
463. On or about March 1, 2022, Defendants STANLEY TOM and ADELLA TOM forced Alexandria M. to engage in physical exertion.
464. On or about March 3, 2022, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
465. On or about March 3, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. in physical exertion.
466. On or about March 3, 2022, Defendants STANLEY TOM and ADELLA TOM forced Alexandria M. and Arabella M. to engage in physical exertion.
467. On or about March 3, 2022, Defendants STANLEY TOM and ADELLA TOM deprived Arabella M. from using the bathroom causing her defecate herself.
468. On or about March 3, 2022, Defendants STANLEY TOM and ADELLA TOM forced Arabella M. to engage in physical exertion while covered in feces.
469. On or about March 4, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
470. On or about March 5, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to lock a child in a room.
471. On or about March 5, 2022, Defendant STANLEY TOM locked a child in a room.
472. On or about March 7, 2022, Defendant STANLEY TOM deprived Arabella M. from using the bathroom.
473. On or about March 9, 2022, Defendant ADELLA TOM struck Arabella M. in the face, punched her in the gut, and stepped on her leg.
474. On or about March 10, 2022, Defendant STANLEY TOM deprived Arabella M. from using the bathroom causing her to urinate on herself.
475. On or about March 11, 2022, co-conspirator BRIAN MCCORMACK deprived Arabella M. from using the bathroom causing her to urinate on herself.
476. On or about March 16, 2022, Defendant LETICIA MCCORMACK, deprived a child from using the bathroom causing her to urinate on herself.
477. On or about March 19, 2022, co-conspirator BRIAN MCCORMACK punished Arabella M. for moving in bed.
478. On or about March 21, 2022, co-conspirator BRIAN MCCORMACK punished Alexandria M. for refusing to climb stairs.
479. On or about March 21, 2022, co-conspirator BRIAN MCCORMACK punished and spanked Alexandria M. for refusing to hold books.
480. On or about March 21, 2022, co-conspirator BRIAN MCCORMACK forced Alexandria M. to engage in physical exertion.
481. On or about March 21, 2022, Defendants STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
482. On or about March 22, 2022, Defendant LETICIA MCCORMACK encouraged co-conspirator and Defendant STANLEY TOM not to try “the stick” on Alexandria M. to force her to engage in physical exertion.

CHARGES (cont'd)

483. On or about March 22, 2022, Defendants STANLEY TOM and ADELLA TOM forced Alexandria M. to engage in physical exertion.
484. On or about March 22, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to remove Alexandria M.'s blankets and Olaf.
485. On or about March 25, 2022, Defendants STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
486. On or about March 28, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
487. On or about March 29, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to deprive Emilyn M. of water.
488. On or about March 29, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
489. On or about March 29, 2022, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
490. On or about March 31, 2022, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
491. On or about March 31, 2022, Defendant LETICIA MCCORMACK, deprived a child from using the bathroom causing her to urinate on herself.
492. On or about March 31, 2022, Defendant LETICIA MCCORMACK, forced a child from to sit in their own urine.
493. On or about March 31, 2022, Defendant STANLEY TOM, deprived a child from using the bathroom.
494. On or about April 1, 2022, Defendants STANLEY TOM forced Alexandria M. to engage in physical exertion.
495. On or about April 2, 2022, Defendants STANLEY TOM forced Alexandria M. to engage in physical exertion.
496. On or about April 3, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. in physical exertion.
497. On or about April 3, 2022, Defendants STANLEY TOM forced Alexandria M. and Arabella M. to engage in physical exertion.
498. On or about April 4, 2022, Defendant LETICIA MCCORMACK, deprived Emilyn M. from using the bathroom causing her to defecate on herself.
499. On or about April 4, 2022, Defendant LETICIA MCCORMACK, isolated Emilyn M.
500. On or about April 4, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Arabella M., Alexandria M. and Emilyn M. in physical exertion.
501. On or about April 5, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Arabella M. and Alexandria M. in physical exertion.
502. On or about April 5, 2022, Defendants STANLEY TOM forced Alexandria M. and Arabella M. to engage in physical exertion.
503. On or about April 5, 2022, Defendant STANLEY TOM, forced Alexandria M. to wear plastic bags on her feet.
504. On or about April 6, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Arabella M. and Alexandria M. in physical exertion.
505. On or about April 6, 2022, Defendants STANLEY TOM forced Alexandria M. and Arabella M. to engage in physical exertion.
506. On or about April 7, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. in physical exertion.
507. On or about April 8, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. in physical exertion.

CHARGES (cont'd)

508. On or about April 8, 2022, Defendant STANLEY TOM forced Alexandria M. to engage in physical exertion.
509. On or about April 9, 2022, Defendant LETICIA MCCORMACK forced Alexandria M. to engage in physical exertion.
510. On or about April 9, 2022, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom.
511. On or about April 9, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Arabella M. in physical exertion.
512. On or about April 11, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. in physical exertion.
513. On or about April 12, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage a child in physical exertion.
514. On or about April 13, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. in physical exertion.
515. On or about April 13, 2022, Defendants ADELLA TOM and STANLEY TOM forced Alexandria M. and Arabella M. to engage in physical exertion.
516. On or about April 14, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
517. On or about April 14, 2022, Defendant STANLEY TOM forced Arabella M. to engage in physical exertion.
518. On or about April 15, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM, to only feed “whoever made their time” during physical exertion.
519. On or about April 15, 2022, Defendants ADELLA TOM and STANLEY TOM forced Alexandria M. and Arabella M. to engage in physical exertion.
520. On or about April 17, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
521. On or about April 17, 2022, Defendant ADELLA TOM forced Alexandria M. to engage in physical exertion.
522. On or about April 18, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. in physical exertion.
523. On or about April 19, 2022, Defendant ADELLA TOM forced Alexandria M. to engage in physical exertion.
524. On or about April 20, 2022, Defendant STANLEY TOM forced Alexandria M. and Arabella M. to engage in physical exertion.
525. On or about April 20, 2022, Defendant ADELLA TOM encouraged co-conspirator and Defendant STANLEY TOM to “start swinging that stick” at Alexandria M.
526. On or about April 22, 2022, Defendant LETICIA MCCORMACK gave co-conspirator and Defendant ADELLA TOM the discretion of whether to feed Arabella M.
527. On or about April 22, 2022, Defendant LETICIA MCCORMACK forced Arabella M. to engage in physical exertion.
528. On or about April 22, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. in physical exertion.
529. On or about April 22, 2022, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
530. On or about April 24, 2022, Defendant ADELLA TOM threatened children by stating she will “beat the shit out of both of you before I call your mother.”
531. On or about April 26, 2022, Defendant ADELLA TOM threatened to beat Arabella M.’s hands until they swell and she can’t use them.
532. On or about April 26, 2022, Defendant ADELLA TOM threatened to break Arabella M.’s hands.

CHARGES (cont'd)

533. On or about April 26, 2022, Defendant ADELLA TOM struck Arabella M. on the legs, shin, hands, chest and gut.
534. On or about April 28, 2022, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
535. On or about April 28, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish Alexandria M. for urinating herself.
536. On or about April 29, 2022, Defendant LETICIA MCCORMACK, deprived Emilyn M. from using the bathroom causing her to urinate on herself.
537. On or about April 29, 2022, Defendant LETICIA MCCORMACK, deprived Emilyn M. from using the bathroom causing her to urinate on herself another time.
538. On or about April 29, 2022, Defendant LETICIA MCCORMACK, forced Emilyn M. to sit in plastic bags.
539. On or about April 29, 2022, Defendant LETICIA MCCORMACK and ADELLA TOM, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
540. On or about April 29, 2022, Defendant LETICIA MCCORMACK forced Alexandria M. and Arabella M. to engage in physical exertion.
541. On or about April 29, 2022, Defendant STANLEY TOM forced Arabella M. to engage in physical exertion.
542. On or about April 30, 2022 and May 1, 2022, Defendant LETICIA MCCORMACK, deprived Emilyn M. from using the bathroom causing her to defecate on herself.
543. On or about May 1, 2022, Defendant LETICIA MCCORMACK, forced Emilyn M. to remain in her crib with feces.
544. On or about May 1, 2022, Defendant LETICIA MCCORMACK, isolated Emilyn M. in her bedroom.
545. On or about May 1, 2022, Defendant LETICIA MCCORMACK, forced Emilyn M. to lie still “on her tummy with her hands out and eyes closed.”
546. On or about May 1, 2022, Defendant ADELLA TOM, slapped a child in the face.
547. On or about May 1, 2022, Defendant LETICIA MCCORMACK and ADELLA TOM forced Alexandria M. and another child to engage in physical exertion.
548. On or about May 2, 2022 to May 3, 2022, Defendant LETICIA MCCORMACK, physically abused a child.
549. On or about May 2, 2022, Defendant LETICIA MCCORMACK threatened to hit a child with a stick while the child ate their food.
550. On or about May 2, 2022, Defendant LETICIA MCCORMACK deprived Alexandria M. of food.
551. On or about May 2, 2022, an unknown co-conspirator spanked Alexandria M. “all through dinner.”
552. On or about May 2, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Arabella M. in physical exertion.
553. On or about May 2, 2022, Defendant STANLEY TOM forced Arabella M. to engage in physical exertion.
554. On or about May 3, 2022, co-conspirator BRIAN MCCORMACK deprived a child from using the bathroom.
555. On or about May 3, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish a child for trying to wake up Leticia and stated: “who the fuck cares if she pees herself”.
556. On or about May 4, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Arabella M. in physical exertion.
557. On or about May 4, 2022, Defendant STANLEY TOM forced Arabella M. to engage in physical exertion.
558. On or about May 5, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. in physical exertion.
559. On or about May 8, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish a child moving in bed.
560. On or about May 8, 2022, Defendant STANLEY TOM forced Alexandria M. to engage in physical exertion.

CHARGES (cont'd)

561. On or about May 11, 2022, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
562. On or about May 11, 2022, Defendant STANLEY TOM forced Alexandria M. to sit in her own urine.
563. On or about May 12, 2022, an unknown co-conspirator deprived a child from using the bathroom causing her to urinate herself.
564. On or about May 12, 2022, an unknown co-conspirator deprived a child from using the bathroom causing her to defecate herself.
565. On or about May 13, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
566. On or about May 14, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM, to engage Alexandria M. in physical exertion.
567. On or about May 16, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM there is a stick on the couch.
568. On or about May 17, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
569. On or about May 18, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
570. On or about May 19, 2022, Defendant LETICIA MCCORMACK, deprived Alexandria M. of food.
571. On or about May 20, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish Alexandria M. taking a bit from a donut after being deprived of food.
572. On or about May 21, 2022, Defendant STANLEY TOM forced Arabella M. to lie still in bed.
573. On or about May 22, 2022, Defendant LETICIA MCCORMACK, deprived Alexandria M. of food.
574. On or about May 22, 2022, Defendant ADELLA TOM, deprived Alexandria M. of food.
575. On or about May 23, 2022, Defendant STANLEY TOM forced a child or children to engage in physical exertion.
576. On or about May 24, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
577. On or about May 24, 2022, Defendant STANLEY TOM forced Arabella M. and Alexandria M. to engage in physical exertion.
578. On or about May 25, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
579. On or about May 27, 2022, Defendant STANLEY TOM imposed a time-limit upon a child or children to eat food.
580. On or about May 27, 2022, Defendant STANLEY TOM deprived Arabella M. of food.
581. On or about May 28, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
582. On or about May 29, 2022, Defendant ADELLA TOM, deprived a child of food.
583. On or about May 30, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
584. On or about May 30, 2022, co-conspirator BRIAN MCCORMACK deprived Emily M. from using the bathroom.
585. On or about May 30, 2022, Defendant ADELLA TOM, forced Arabella M. to eat while standing on one leg.
586. On or about May 30, 2022, Defendant ADELLA TOM, forced Arabella M. to lie on the floor.
587. On or about May 30, 2022, Defendant ADELLA TOM, struck Arabella M.'s feet and hands.

CHARGES (cont'd)

588. On or about May 30, 2022, Defendant ADELLA TOM, threatened Alexandria M. by stating “she was next if she didn’t stop her night behavior” and “what she saw with Bella will happen to her.”
589. On or about May 31, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to engage Alexandria M. and Arabella M. in physical exertion.
590. On or about May 31, 2022, Defendant STANLEY TOM forced Arabella M. to engage in physical exertion.
591. On or about or before June 1, 2022, an unknown co-conspirator imposed a rule that a child must chew their food 15 times while eating.
592. On or about June 1, 2022, Defendant STANLEY TOM deprived Arabella M. of food.
593. On or about June 2, 2022, co-conspirator BRIAN MCCORMACK, physically abused a child.
594. On or about June 2, 2022, co-conspirator BRIAN MCCORMACK, punished Arabella M. with a stick.
595. On or about June 3, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish Arabella M. so co-conspirator and Defendant ADELLA TOM won’t have to.
596. On or about June 4, 2022, co-conspirator BRIAN MCCORMACK, forced Emilyn M. to lie still.
597. On or about June 4, 2022, co-conspirator BRIAN MCCORMACK, hit a child with a stick while the child ate.
598. On or about June 4, 2022, co-conspirator BRIAN MCCORMACK, hit a child with a stick for biting her lip, putting her shoulders up, or “whatever else.”
599. On or about June 6, 2022, co-conspirator BRIAN MCCORMACK, advised co-conspirator and Defendant LETICIA MCCORMACK he is not sure they should bring Arabella M. out in public because of how she looks.
600. On or about June 7, 2022, co-conspirator BRIAN MCCORMACK, watched a child to prevent her from making noise or attracting attention of the neighbors.
601. On or about June 7, 2022, co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to defecate and urinate herself.
602. On or about June 7, 2022, co-conspirator BRIAN MCCORMACK, hit Arabella M. “all night” and forced her to sit in her own feces and urine.
603. On or about June 8, 2022, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK isolated Arabella M.
604. On or about June 8, 2022, Defendant STANLEY TOM forced Arabella M. to lie still.
605. On or about June 10, 2022, Defendant STANLEY TOM forced Arabella M. to lie still.
606. On or about June 11, 2022, Defendant STANLEY TOM forced Arabella M. to lie still.
607. On or about May 12, 2022 and June 12, 2022, Defendant LETICIA MCCORMACK, cut Alexandria M.’s hair as punishment.
608. On or about June 12, 2022, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, forced Arabella M. to lie on a doggie pad.
609. On or about June 14, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM, to engage Alexandria M. in physical exertion.
610. On or about June 14, 2022, Defendant ADELLA TOM, forced Alexandria M. to engage in physical exertion.
611. On or about June 14, 2022, Defendant ADELLA TOM, deprived Arabella M. of food.
612. On or about June 16, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM, to engage Alexandria M. in physical exertion.
613. On or about June 16, 2022, Defendant ADELLA TOM, forced Alexandria M. to engage in physical exertion.
614. On or about June 17, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM, to engage Alexandria M. in physical exertion.
615. On or about June 17, 2022, Defendant ADELLA TOM, forced Alexandria M. to engage in physical exertion.
616. On or about June 17, 2022, Defendant ADELLA TOM, deprived Alexandria M. of using the bathroom causing her to urinate on herself.

CHARGES (cont'd)

617. On or about June 17, 2022, Defendant LETICIA MCCORMACK deprived Alexandria M. of food as punishment for urinating herself after co-conspirator and Defendant ADELLA TOM deprived Alexandria M. from using the bathroom.
618. On or about June 20, 2022, Defendant ADELLA TOM, stood on Arabella M.'s leg while pushing on the other.
619. On or about June 21, 2022, co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom.
620. On or about June 21, 2022, Defendant ADELLA TOM, deprived Arabella M. of using the bathroom.
621. On or about June 21, 2022, Defendant ADELLA TOM, deprived Arabella M. of water.
622. On or about June 23, 2022, Defendant ADELLA TOM, imposed rules about the order in which Arabella M. may eat her food.
623. On or about June 23, 2022, Defendant ADELLA TOM, struck Arabella M.'s feet, face and head.
624. On or about June 24, 2022, Defendant ADELLA TOM, deprived Alexandria M. of using the bathroom.
625. On or about June 24, 2022, Defendant ADELLA TOM, threatened to break Alexandria M.'s ribs.
626. On or about June 25, 2022, Defendant ADELLA TOM, forced a child to engage in physical exertion.
627. On or about June 25, 2022, Defendant LETICIA MCCORMACK, forced a child to engage in physical exertion.
628. On or about June 26, 2022, Defendant LETICIA MCCORMACK, installed an alarm on Emilyn's crib.
629. On or about June 27, 2022, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
630. On or about June 27, 2022, Defendant LETICIA MCCORMACK and ADELLA TOM, deprived Alexandria M. from using the bathroom causing her to urinate on herself another time.
631. On or about June 27, 2022, Defendant LETICIA MCCORMACK and ADELLA TOM, deprived Arabella M. from using the bathroom causing her to defecate on herself.
632. On or about June 27, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM, to engage Alexandria M. in physical exertion.
633. On or about June 28, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM, to engage Alexandria M. and Arabella M. in physical exertion.
634. On or about June 29, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM, to engage Alexandria M. in physical exertion, and gave ADELLA TOM discretion to engage Arabella M. in physical exertion as well.
635. On or about June 30, 2022, Defendant ADELLA TOM, forced Alexandria M. and Arabella M. to engage in physical exertion.
636. On or about July 1, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM, to punish Arabella M. for not lying down properly.
637. On or about July 1, 2022, Defendant ADELLA TOM, punished Arabella M. for having her hands in her crotch.
638. On or about July 2, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM, to isolate Alexandria M.
639. On or about July 2, 2022, Defendant ADELLA TOM, deprived Alexandria M. of using the bathroom causing her to urinate on herself.
640. On or about July 2, 2022, Defendant LETICIA MCCORMACK, deprived Emilyn M. from using the bathroom causing her to urinate on herself.
641. On or about July 3, 2022, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
642. On or about July 3, 2022, Defendant LETICIA MCCORMACK and ADELLA TOM, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
643. On or about July 3, 2022, Defendant ADELLA TOM imposed a time-limit on Arabella M. to eat her food.

CHARGES (cont'd)

644. On or about July 5, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant ADELLA TOM, to engage Alexandria M. in physical exertion.
645. On or about July 7, 2022, Defendant LETICIA MCCORMACK deprived Emilyn M. of food because she was being “a little bitch.”
646. On or about July 8, 2022, Defendant LETICIA MCCORMACK forced a child to stand for hours.
647. On or about July 8, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to deprive children of food when failing to eat within the imposed time-limit.
648. On or about July 8, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM to engage Arabella M. in physical exertion.
649. On or about July 11, 2022, Defendant STANLEY TOM struck Arabella M. with a stick.
650. On or about July 12, 2022, Defendant STANLEY TOM forced Alexandria M. to be still while standing on plastic bags.
651. On or about July 17, 2022, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK failed to get Arabella M. medical care.
652. On or about July 18, 2022, Defendant LETICIA MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
653. On or about July 18, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK not to give Arabella M. extra calories.
654. On or about July 22, 2022, Defendant STANLEY TOM deprived Emilyn M. from using the bathroom causing her to defecate herself.
655. On or about July 22, 2022, Defendant STANLEY TOM forced Emilyn M. to sit in her own feces.
656. On or about July 22, 2022, Defendant STANLEY TOM deprived Emilyn M. of food.
657. On or about July 22, 2022, Defendant ADELLA TOM, supported co-conspirator and Defendant STANLEY TOM by stating it was Emilyn’s “choice” to defecate in her pajamas and miss a meal.
658. On or about July 23, 2022, Defendant STANLEY TOM forced Arabella M. to sit in her own urine.
659. On or about July 23, 2022, Defendant STANLEY TOM forced Arabella M. to engage in physical exertion.
660. On or about July 24, 2022, co-conspirator BRIAN MCCORMACK punished Arabella M. for moving in bed.
661. On or about July 24, 2022 to July 25, 2022, Defendants LETICIA MCCORMACK and STANLEY TOM, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
662. On or about July 28, 2022, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK failed to get Alexandria M. medical care.
663. On or about July 28, 2022, Defendant LETICIA MCCORMACK, deprived Arabella M. from using the bathroom causing her to urinate on herself.
664. On or about July 28, 2022, Defendant LETICIA MCCORMACK, deprived Emilyn M. from using the bathroom causing her to urinate on herself.
665. On or about July 30, 2022, Defendant LETICIA MCCORMACK and STANLEY TOM, deprived Arabella M. from using the bathroom causing her to urinate on herself.
666. On or about August 2, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator and Defendant STANLEY TOM Alexandria M. and Arabella M. may not longer have a heater in their bedroom and are not allowed to speak.
667. On or about August 2, 2022, co-conspirator BRIAN MCCORMACK, deprived a child from using the bathroom causing her to urinate herself.
668. On or about August 3, 2022, co-conspirator BRIAN MCCORMACK, deprived Arabella M. of food.
669. On or about August 4, 2022, co-conspirator BRIAN MCCORMACK, deprived Arabella M. of food and water.

CHARGES (cont'd)

670. On or about August 4, 2022, co-conspirator BRIAN MCCORMACK, deprived Emilyn M. from using the bathroom causing her to urinate herself.
671. On or about August 4, 2022, Defendant LETICIA MCCORMACK instructed co-conspirators and Defendants ADELLA TOM and STANLEY TOM, to go into Arabella M.'s room and "not let her get away with anything" because Arabella M. has been moving her arm.
672. On or about August 4, 2022, Defendant STANLEY TOM deprived a child from using the bathroom causing her to urinate herself.
673. On or about August 7, 2022, Defendant LETICIA MCCORMACK and/or co-conspirator BRIAN MCCORMACK deprived Alexandria M. of food and water.
674. On or about August 8, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to deprive Alexandria M. and Emilyn M. of water.
675. On or about August 9, 2022, co-conspirator BRIAN MCCORMACK, deprived Alexandria M. from using the bathroom causing her to defecate herself.
676. On or about August 11, 2022, Defendant LETICIA MCCORMACK instructed co-conspirator BRIAN MCCORMACK to punish children for setting off alarms.
677. On or about August 24, 2022, co-conspirator BRIAN MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate herself.
678. On or about August 25, 2022, Defendant ADELLA TOM, encouraged co-conspirator and Defendant STANLEY TOM to just let Arabella M. "bleed" from her nose because she "just wants attention."
679. On or about August 26, 2022, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK failed to get Arabella M. medical care.
680. On or about August 26, 2022, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK imposed a time-limit upon a child to eat food.
681. On or about August 26, 2022, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK forced a child to eat food while on her knees.
682. On or about August 26, 2022, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK, deprived Alexandria M. from using the bathroom causing her to urinate on herself.
683. On or about August 26, 2022, co-conspirator BRIAN MCCORMACK, encouraged co-conspirator and Defendant LETICIA MCCORMACK to let Alexandria M. sit in her own waste stating: "She can soak in that shit and get sick. Bella will be done soon and we will only have two to worry about."
684. On or about August 27, 2022, Defendant LETICIA MCCORMACK, forced Arabella M. to lie still on her back.
685. On or about August 27, 2022, Defendant LETICIA MCCORMACK, instructed co-conspirator and Defendant STANLEY TOM to engage Alexandria M. in physical exertion.
686. On or about August 27, 2022, Defendant STANLEY TOM struck Arabella M. multiple times while she laid in bed, sick.
687. On or about August 27, 2022, Defendant STANLEY TOM forced Alexandria M. to engage in physical exertion.
688. On or about August 28, 2022, Defendant LETICIA MCCORMACK and co-conspirator BRIAN MCCORMACK failed to get Arabella M. medical care.
689. On or about August 28, 2022, Defendant STANLEY TOM failed to get Arabella M. medical care.
690. On or about August 29, 2022, co-conspirator BRIAN MCCORMACK, texted co-conspirator and Defendant LETICIA MCCORMACK, "if I go first maybe you can claim abuse and get out of it" after Arabella M. was pronounced deceased.

CHARGES (cont'd)

691. On or about August 30, 2022, co-conspirator BRIAN MCCORMACK, committed suicide.

COUNT 3 - TORTURE

On or about and between January 1, 2017 and August 30, 2022, LETICIA DIANE MCCORMACK, ADELLA JUANITA TOM, and STANLEY TOM did unlawfully and with the intent to cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon ARABELLA M. (age 11), in violation of PENAL CODE SECTION 206.

COUNT 4 - TORTURE

On or about and between January 1, 2017 and August 30, 2022, LETICIA DIANE MCCORMACK, ADELLA JUANITA TOM, and STANLEY TOM did unlawfully and with the intent to cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon ALEXANDRIA M. (age 7), in violation of PENAL CODE SECTION 206.

COUNT 5 - TORTURE

On or about and between January 1, 2017 and August 30, 2022, LETICIA DIANE MCCORMACK, ADELLA JUANITA TOM, and STANLEY TOM did unlawfully and with the intent to cause cruel and extreme pain and suffering for the purpose of revenge, extortion, persuasion and for a sadistic purpose, inflict great bodily injury, as defined in Penal Code section 12022.7, upon EMILYN M. (age 6), in violation of PENAL CODE SECTION 206.

COUNT 6 - CHILD ABUSE - FELONY

On or about and between January 1, 2017 and August 30, 2022, LETICIA DIANE MCCORMACK, ADELLA JUANITA TOM, and STANLEY TOM did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit ARABELLA M. (age 11), a child, to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of that child to be injured and did willfully cause and permit that child to be placed in a situation where his or her person and health is endangered in violation of PENAL CODE SECTION 273a(a).

And it is further alleged that said defendant, LETICIA DIANE MCCORMACK, under circumstances and conditions likely to produce great bodily harm and death, did willfully cause and permit ARABELLA M. (age 11), a child, to suffer and did inflict thereon unjustifiable physical pain and injury that resulted in death, within the meaning of PENAL CODE SECTION 12022.95.

CHARGES (cont'd)

And it is further alleged that said defendant, ADELLA JUANITA TOM, under circumstances and conditions likely to produce great bodily harm and death, did willfully cause and permit ARABELLA M. (age 11), a child, to suffer and did inflict thereon unjustifiable physical pain and injury that resulted in death, within the meaning of PENAL CODE SECTION 12022.95.

And it is further alleged that said defendant, STANLEY TOM, under circumstances and conditions likely to produce great bodily harm and death, did willfully cause and permit ARABELLA M. (age 11), a child, to suffer and did inflict thereon unjustifiable physical pain and injury that resulted in death, within the meaning of PENAL CODE SECTION 12022.95.

COUNT 7 - CHILD ABUSE - FELONY

On or about and between January 1, 2017 and August 30, 2022, LETICIA DIANE MCCORMACK, ADELLA JUANITA TOM, and STANLEY TOM did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit ALEXANDRIA M. (age 7), a child, to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of that child to be injured and did willfully cause and permit that child to be placed in a situation where his or her person and health is endangered in violation of PENAL CODE SECTION 273a(a).

And it is further alleged that in the commission and attempted commission of the above offense the defendant, LETICIA DIANE MCCORMACK, personally inflicted great bodily injury upon ALEXANDRIA M. (age 7), not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

And it is further alleged that in the commission and attempted commission of the above offense the defendant, ADELLA JUANITA TOM, personally inflicted great bodily injury upon ALEXANDRIA M. (age 7), not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

And it is further alleged that in the commission and attempted commission of the above offense the defendant, STANLEY TOM, personally inflicted great bodily injury upon ALEXANDRIA M. (age 7), not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

COUNT 8 - CHILD ABUSE - FELONY

On or about and between January 1, 2017 and August 30, 2022, LETICIA DIANE MCCORMACK, ADELLA JUANITA TOM, and STANLEY TOM did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit EMILYN M. (age 6), a child, to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of that child to be injured and did willfully cause and permit that child to be placed in a situation where his or her person and health is endangered in violation of PENAL CODE SECTION 273a(a).

And it is further alleged that in the commission and attempted commission of the above offense the defendant, LETICIA DIANE MCCORMACK, personally inflicted great bodily injury upon EMILYN M. (age 6), not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

CHARGES (cont'd)

And it is further alleged that in the commission and attempted commission of the above offense the defendant, ADELLA JUANITA TOM, personally inflicted great bodily injury upon EMILYN M. (age 6), not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

And it is further alleged that in the commission and attempted commission of the above offense the defendant, STANLEY TOM, personally inflicted great bodily injury upon EMILYN M. (age 6), not an accomplice to the above offense, within the meaning of PENAL CODE SECTION 12022.7(a).

NOTICE: Any defendant named on this complaint who is on criminal probation in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's probation, on any and all such probation grants, utilizing the same evidence, at the preliminary hearing. Defenses to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

NOTICE: Any defendant named on this complaint who is on Mandatory Supervision in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's Mandatory Supervision pursuant to Penal Code Sections 1170(h)(5)(B) and 1203.2, on any and all such grants, utilizing the same evidence, at the preliminary hearing. Defense to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

Pursuant to PENAL CODE SECTION 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by PENAL CODE SECTION 1054.3.

Sheriff's records indicate that as of the booking date one or more defendants have not yet provided a DNA sample to the DOJ database. Pursuant to Penal Code Section 296(e), the court shall order collection of DNA from the defendant(s) if advised by the prosecuting attorney that a sample is required but has not been provided by the defendant. Pursuant to Penal Code sections 296/296.1, if not already required from a past conviction, any defendants who have not done so will be required to provide a sample upon conviction of this felony offense.

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant STANLEY TOM in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant LETICIA DIANE MCCORMACK in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant ADELLA JUANITA TOM in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER CE414848, CONSISTS OF 8 COUNTS.

Executed at City of El Cajon, County of San Diego, State of California, on January 17, 2024.

COMPLAINANT

INFORMATION

SUMMER STEPHAN
District Attorney
County of San Diego
State of California
by:

Date

Deputy District Attorney