THE SUPERIOR COURT, STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA
SANTA BARBARA DIVISION

THE PEOPLE OF THE STATE OF CALIFORNIA
Plaintiff,

vs.

JENICA MONIQUE OCHOA **DOB:** 08/15/1981
AKA: JENICA MONIQUE RAMOS
AKA: JENICA MONIQUE KENT
AKA: JENNICA MONIQUE SANDOVAL
AKA: JENICA MONIQUE SANDOVAL

KENNETH EUGENE TOMPKINS **DOB:** 10/24/1983
AKA: KENNETH E TOMPKINS

Defendant(s).

DA No. 26-018466

Court No. 26CR08639

1st Amended
FELONY COMPLAINT

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA
OCT 30 2026
Angela Braun, Executive Officer
By
Yadira De La Cruz, Deputy Clerk

The undersigned is informed and believes that:

COUNT 1

On or about and between October 23, 2026 and October 27, 2026, in the County of Santa Barbara, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by **JENICA MONIQUE OCHOA & KENNETH EUGENE TOMPKINS**, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **CONCEALING A DEATH**, in violation of Section 152 , of the **PENAL** Code, a FELONY and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of **SANTA BARARA**:

OVERT ACTS:

1. Concealing the body from friends, family members, or law enforcement
2. Wrapping up the body in a bedroll
3. Putting the body in a metal container
4. Wrapping the metal container with saran wrap

SPEC ALLEG / PC667(d)(1),(e)(1) – STRIKE PRIOR

It is further alleged pursuant to PENAL CODE SECTION 667(d)(1),(e)(1), PENAL CODE SECTION 1170.12(b)(1),(c)(1), and PENAL CODE SECTION 1192.7(c)(18) and 667.5(c) that said defendants **JENICA MONIQUE OCHOA**, suffered the following prior convictions of a serious or violent felony or juvenile adjudication:

CONV/DT	SEC/VIOL	DKT/NO	TYPE/COURT	JURISDICTION
08/25/2008	PC 459 1ST	1255859	SUPERIOR	SANTA BARBARA

SPEC ALLEG / PC667(d)(1),(e)(1) – STRIKE PRIOR

It is further alleged pursuant to PENAL CODE SECTION 667(d)(1),(e)(1), PENAL CODE SECTION 1170.12(b)(1),(c)(1), and PENAL CODE SECTION 1192.7(c)(18) and 667.5(c) that said defendants **KENNETH EUGENE TOMPKINS**, suffered the following prior convictions of a serious or violent felony or juvenile adjudication:

CONV/DT	SEC/VIOL	DKT/NO	TYPE/COURT	JURISDICTION
10/01/2014	PC 459 1ST	VCF295846	SUPERIOR	TULARE

SPECIAL ALLEGATION: AGGRAVATING FACTORS

It is further alleged as to defendants **JENICA MONIQUE OCHOA**, as to Count(s) **1**, that the People will seek findings from the jury on factors in aggravation pursuant to California Rules of Court, Rule 4.421 that:

Pursuant to California Rules of Court, Rule 4.421(a):
(a)(8) The manner in which the crime was carried out indicates planning, sophistication, or professionalism;

Pursuant to California Rules of Court, Rule 4.421(b):
(b)(2) The defendant's prior convictions as an adult or sustained petitions in juvenile delinquency proceedings are numerous or of increasing seriousness;
(b)(3) The defendant has served a prior term in prison or county jail under section 1170(h);

SPECIAL ALLEGATION: AGGRAVATING FACTORS

It is further alleged as to defendants **KENNETH EUGENE TOMPKINS**, as to Count(s) **1**, that the People will seek findings from the jury on factors in aggravation pursuant to California Rules of Court, Rule 4.421 that:

Pursuant to California Rules of Court, Rule 4.421(a):
(a)(8) The manner in which the crime was carried out indicates planning, sophistication, or professionalism;

Pursuant to California Rules of Court, Rule 4.421(b):
(b)(2) The defendant's prior convictions as an adult or sustained petitions in juvenile delinquency proceedings are numerous or of increasing seriousness;

COUNT 2

On or about and between October 23, 2026 and October 27, 2026, in the County of Santa Barbara, the crime of **CONDEALING A DEATH**, in violation of **PENAL CODE SECTION 152**, a **MISDEMEANOR**, was committed by **JENICA MONIQUE OCHOA & KENNETH EUGENE TOMPKINS**, who did willfully and unlawfully concealed a death by impeding authorities or family members from discovering a body, destroying evidence related to the deceased, or destroying actual physical instrumentality of a death.

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

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 2 COUNT(S).

Executed at Santa Barbara, California, on 10/30/2026.



JOHN T. SAVRNOCH
DISTRICT ATTORNEY

Agency: SBPD
Agency Case No.: SB202663086

DEFENDANT NAME	SEX	RACE	HGT	WGT	EYES	HAIR	DRIVER'S LICENSE	STS	COURT DATE
JENICA MONIQUE OCHOA	F	Hispanic or Latino	5'04"	150	Brown	Brown	D2006937	IC	10/30/2026
KENNETH EUGENE TOMPKINS	M	Caucasian	6'00	170	Brown	Brown	D2554463	IC	10/30/2026

mpl