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SSD-16-311789
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TEAM: (SACA)

XRef: 3771778



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9 SUPERIOR COURT OF CALIFORNIA
10 COUNTY OF SACRAMENTO

Deeened Information

11 THE PEOPLE OF THE STATE OF CALIFORNIA,
12
13 vs.

No. 16FE020660
AMENDED FELONY
COMPLAINT

Second

14
15 VICTOR MIROSHNICHENKO,

Defendant.

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17
18 The People of the State of California upon oath of the undersigned, upon information and belief
19 complain against the defendant above named for the crime(s) as follows:
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21 COUNT ONE

22 On or about and between April 28, 2015, and April 27, 2016, at and in the County of
23 Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a
24 felony, namely: a violation of Section 288.7(b) of the Penal Code of the State of California, in
25 that said defendant, being 18 years of age or older, did willfully and unlawfully commit an act of
26 oral copulation or sexual penetration, as defined in Penal Code Section 289, with [REDACTED],
27 a child 10 years of age or younger, to wit, 10 years.
28

29
30 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
31 1192.7(c)."
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34 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
35 290. Willful failure to register is a crime."
36



COUNT TWO

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Count One hereof: On or about and between April 28, 2015, and April 27, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288.7(b) of the Penal Code of the State of California, in that said defendant, being 18 years of age or older, did willfully and unlawfully commit an act of oral copulation or sexual penetration, as defined in Penal Code Section 289, with [REDACTED], a child 10 years of age or younger, to wit, 10 years.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."

COUNT THREE

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One and Two hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, mouth to vagina in kids bathroom (different than Counts One or Two), upon and with the body and certain parts and members thereof of [REDACTED] a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."



COUNT FOUR

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Three hereof: On or about October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, mouth to vagina (last time in the kids bathroom when mom knocked on the door), upon and with the body and certain parts and members thereof of [REDACTED] a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."

COUNT FIVE

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Four hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, vibrator to vagina (first time), upon and with the body and certain parts and members thereof of [REDACTED], a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."



COUNT SIX

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Five hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, vibrator to vagina (last time), upon and with the body and certain parts and members thereof of [REDACTED], a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."

COUNT SEVEN

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Six hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, directed her to use a sex toy and she used a sex toy on her vagina (first time), upon and with the body and certain parts and members thereof of [REDACTED], a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."

COUNT EIGHT

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Seven hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, directed her to use a sex toy and she used a sex toy on her vagina (last time), upon and with the body and certain parts and members thereof of [REDACTED], a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."

COUNT NINE

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Eight hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, fingers to vagina in the garage (first time), upon and with the body and certain parts and members thereof of [REDACTED], a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."

COUNT TEN

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Nine hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, fingers to vagina in the garage (last time), upon and with the body and certain parts and members thereof of [REDACTED] a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."

COUNT ELEVEN

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Ten hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, mouth to vagina in mom and dad's bathroom (different than Counts One and Two), upon and with the body and certain parts and members thereof of [REDACTED] a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."



COUNT TWELVE

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Eleven hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, mouth to vagina in mom and dad's bed (a time different than Counts One and Two), upon and with the body and certain parts and members thereof of [REDACTED], a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."

COUNT THIRTEEN

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Twelve hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, mouth to vagina in mom and dad's bed (last time), upon and with the body and certain parts and members thereof of [REDACTED] a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."



COUNT FOURTEEN

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Thirteen hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, fingers to vagina in [REDACTED] room (first time), upon and with the body and certain parts and members thereof of [REDACTED], a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."

COUNT FIFTEEN

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Fourteen hereof: On or about and between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, fingers to vagina in [REDACTED] room (last time), upon and with the body and certain parts and members thereof of [REDACTED], a child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."



COUNT SIXTEEN

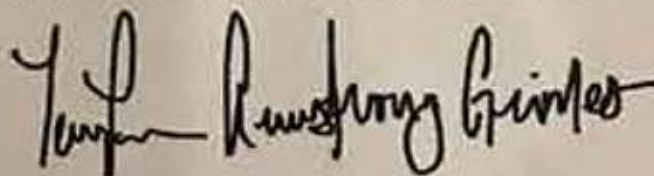
For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Fifteen hereof: On or about and between April 28, 2016, and September 1, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, mouth to vagina at Defendant's apartment during the pizza pick-up, upon and with the body and certain parts and members thereof of [REDACTED], a child under the age of fourteen years, to wit, age 11 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the said child.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 290. Willful failure to register is a crime."

I declare upon information and belief and under penalty of perjury that the foregoing is true and correct.

Executed at Sacramento County, California, the 19th day of January, 2017.



TERIANN GRIMES

SACRAMENTO COUNTY DISTRICT ATTORNEY

(916) 874-6218

Telephone Number

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