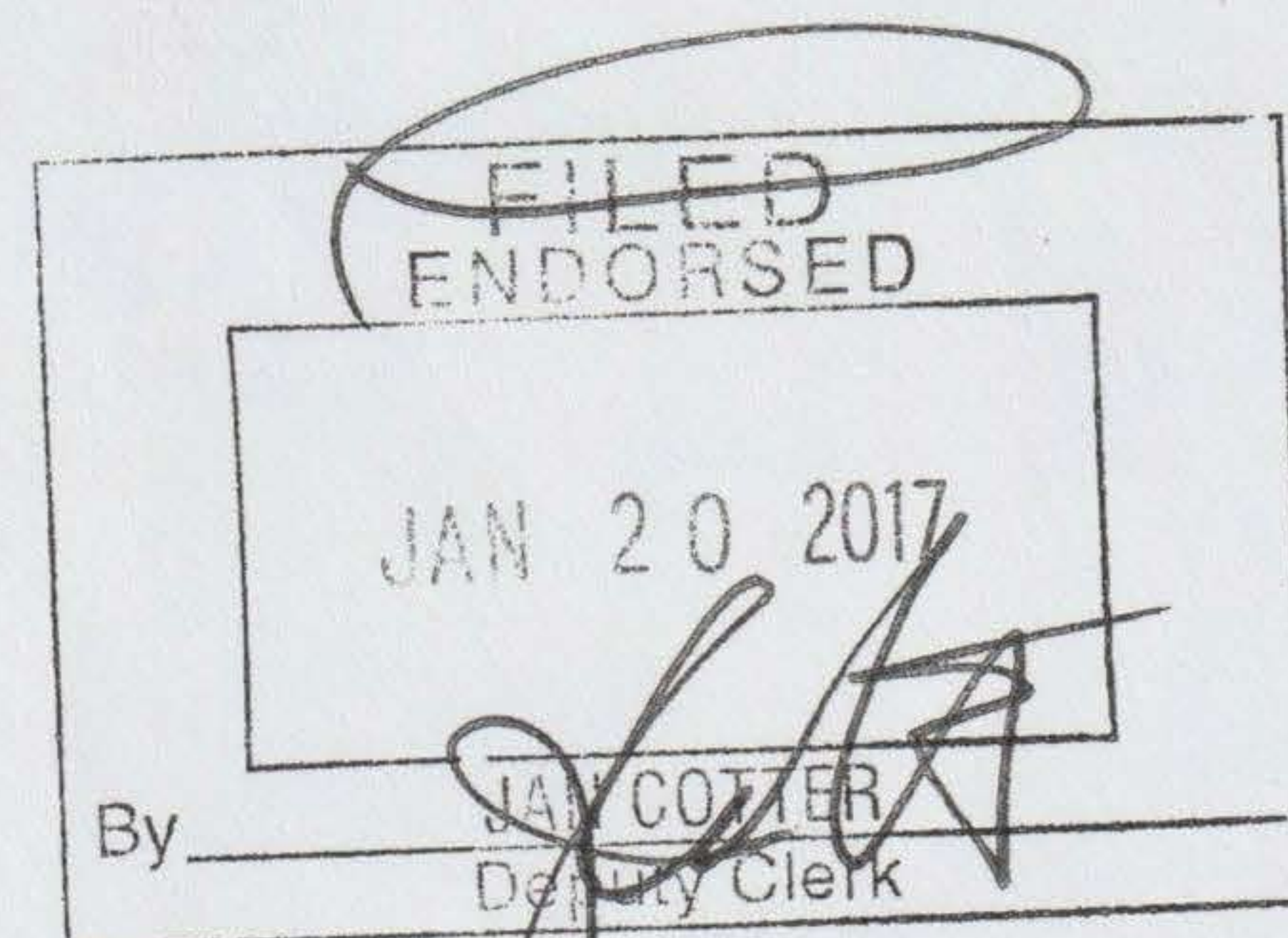


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SSD-16-311789
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**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO**

Deemed Information

THE PEOPLE OF THE STATE OF CALIFORNIA,

vs.

No. 16FE020660

AMENDED FELONY
COMPLAINT

VICTOR MIROSHNICHENKO,

Defendant.

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

COUNT ONE

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] DOE, 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."



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4 **COUNT TWO**

5 For a further and separate cause of action, being a different offense of the same class of crimes
6 and offenses as the charges set forth in Count One hereof: On or about and between April 28,
7 2015, and April 27, 2016, at and in the County of Sacramento, State of California, the defendant,
8 VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288.7(b) of
9 the Penal Code of the State of California, in that said defendant, being 18 years of age or older,
10 did willfully and unlawfully commit an act of oral copulation or sexual penetration, as defined in
11 Penal Code Section 289, with [REDACTED] DOE, a child 10 years of age or younger, to wit, 10
12 years.
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15 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
16 1192.7(c)."
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19 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
20 290. Willful failure to register is a crime."
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22 **COUNT THREE**

23 For a further, and separate cause of action, being a different offense of the same class of crimes
24 and offenses as the charges set forth in Counts One and Two hereof: On or about and between
25 April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California,
26 the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of
27 Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully,
28 unlawfully, and lewdly commit a lewd and lascivious act, to wit, mouth to vagina in kids
29 bathroom (different than Counts One or Two), upon and with the body and certain parts and
30 members thereof of [REDACTED] DOE, a child under the age of fourteen years, to wit, age 10-11
31 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual
32 desires of the said defendant and the said child.
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34 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
35 1192.7(c)."
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37 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
38 290. Willful failure to register is a crime."
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4 **COUNT FOUR**

5 For a further and separate cause of action, being a different offense of the same class of crimes
6 and offenses as the charges set forth in Counts One through Three hereof: On or about October
7 16, 2016, at and in the County of Sacramento, State of California, the defendant, VICTOR
8 MIROSHNICHENKO, did commit a felony, namely: a violation of Section 288(a) of the Penal
9 Code of the State of California, in that said defendant did willfully, unlawfully, and lewdly
10 commit a lewd and lascivious act, to wit, mouth to vagina (last time in the kids bathroom when
11 mom knocked on the door), upon and with the body and certain parts and members thereof of
12 [REDACTED] DOE, a child under the age of fourteen years, to wit, age 10-11 years, with the intent of
13 arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant
14 and the said child.

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16 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
17 1192.7(c)."
18

19 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
20 290. Willful failure to register is a crime."
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22 **COUNT FIVE**

23 For a further, and separate cause of action, being a different offense of the same class of crimes
24 and offenses as the charges set forth in Counts One through Four hereof: On or about and
25 between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of
26 California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a
27 violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did
28 willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, vibrator to vagina
29 (first time), upon and with the body and certain parts and members thereof of [REDACTED] DOE, a
30 child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing,
31 appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the
32 said child.
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34
35 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
36 1192.7(c)."
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38 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
39 290. Willful failure to register is a crime."
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4 **COUNT SIX**

5 For a further and separate cause of action, being a different offense of the same class of crimes
6 and offenses as the charges set forth in Counts One through Five hereof: On or about and
7 between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of
8 California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a
9 violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did
10 willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, vibrator to vagina
11 (last time), upon and with the body and certain parts and members thereof of [REDACTED] DOE, a
12 child under the age of fourteen years, to wit, age 10-11 years, with the intent of arousing,
13 appealing to, and gratifying the lust, passions, and sexual desires of the said defendant and the
14 said child.
15

16 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
17 1192.7(c)."
18

19 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
20 290. Willful failure to register is a crime."
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22 **COUNT SEVEN**

23 For a further and separate cause of action, being a different offense of the same class of crimes
24 and offenses as the charges set forth in Counts One through Six hereof: On or about and between
25 April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of California,
26 the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a violation of
27 Section 288(a) of the Penal Code of the State of California, in that said defendant did willfully,
28 unlawfully, and lewdly commit a lewd and lascivious act, to wit, directed her to use a sex toy and
29 she used a sex toy on her vagina (first time), upon and with the body and certain parts and
30 members thereof of [REDACTED] DOE, a child under the age of fourteen years, to wit, age 10-11
31 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual
32 desires of the said defendant and the said child.
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34
35 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
36 1192.7(c)."
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38 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
39 290. Willful failure to register is a crime."
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4 **COUNT EIGHT**

5 For a further and separate cause of action, being a different offense of the same class of crimes
6 and offenses as the charges set forth in Counts One through Seven hereof: On or about and
7 between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of
8 California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a
9 violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did
10 willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, directed her to use a
11 sex toy and she used a sex toy on her vagina (last time), upon and with the body and certain parts
12 and members thereof of [REDACTED] DOE, a child under the age of fourteen years, to wit, age 10-11
13 years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual
14 desires of the said defendant and the said child.
15

16 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
17 1192.7(c)."
18

19 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
20 290. Willful failure to register is a crime."
21

22 **COUNT NINE**

23 For a further and separate cause of action, being a different offense of the same class of crimes
24 and offenses as the charges set forth in Counts One through Eight hereof: On or about and
25 between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of
26 California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a
27 violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did
28 willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, fingers to vagina in
29 the garage (first time), upon and with the body and certain parts and members thereof of
30 [REDACTED] DOE, a child under the age of fourteen years, to wit, age 10-11 years, with the intent of
31 arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant
32 and the said child.
33

34 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
35 1192.7(c)."
36

37 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
38 290. Willful failure to register is a crime."
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4 **COUNT TEN**

5 For a further and separate cause of action, being a different offense of the same class of crimes
6 and offenses as the charges set forth in Counts One through Nine hereof: On or about and
7 between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of
8 California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a
9 violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did
10 willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, fingers to vagina in
11 the garage (last time), upon and with the body and certain parts and members thereof of
12 [REDACTED] DOE, a child under the age of fourteen years, to wit, age 10-11 years, with the intent of
13 arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant
14 and the said child.
15

16 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
17 1192.7(c)."
18

19 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
20 290. Willful failure to register is a crime."
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22 **COUNT ELEVEN**

23 For a further and separate cause of action, being a different offense of the same class of crimes
24 and offenses as the charges set forth in Counts One through Ten hereof: On or about and
25 between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of
26 California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a
27 violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did
28 willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, mouth to vagina in
29 mom and dad's bathroom (different than Counts One and Two), upon and with the body and
30 certain parts and members thereof of [REDACTED] DOE, a child under the age of fourteen years, to
31 wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions,
32 and sexual desires of the said defendant and the said child.
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34
35 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
36 1192.7(c)."
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38 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
39 290. Willful failure to register is a crime."
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4 **COUNT TWELVE**

5 For a further and separate cause of action, being a different offense of the same class of crimes
6 and offenses as the charges set forth in Counts One through Eleven hereof: On or about and
7 between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of
8 California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a
9 violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did
10 willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, mouth to vagina in
11 mom and dad's bed (a time different than Counts One and Two), upon and with the body and
12 certain parts and members thereof of [REDACTED] DOE, a child under the age of fourteen years, to
13 wit, age 10-11 years, with the intent of arousing, appealing to, and gratifying the lust, passions,
14 and sexual desires of the said defendant and the said child.
15

16 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
17 1192.7(c)."
18

19 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
20 290. Willful failure to register is a crime."
21

22 **COUNT THIRTEEN**

23 For a further and separate cause of action, being a different offense of the same class of crimes
24 and offenses as the charges set forth in Counts One through Twelve hereof: On or about and
25 between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of
26 California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a
27 violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did
28 willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, mouth to vagina in
29 mom and dad's bed (last time), upon and with the body and certain parts and members thereof of
30 [REDACTED] DOE, a child under the age of fourteen years, to wit, age 10-11 years, with the intent of
31 arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant
32 and the said child.
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34
35 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
36 1192.7(c)."
37

38 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
39 290. Willful failure to register is a crime."
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4 **COUNT FOURTEEN**

5 For a further and separate cause of action, being a different offense of the same class of crimes
6 and offenses as the charges set forth in Counts One through Thirteen hereof: On or about and
7 between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of
8 California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a
9 violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did
10 willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, fingers to vagina in
11 [REDACTED] room (first time), upon and with the body and certain parts and members thereof of
12 [REDACTED] DOE, a child under the age of fourteen years, to wit, age 10-11 years, with the intent of
13 arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant
14 and the said child.
15

16 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
17 1192.7(c)."
18

19 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
20 290. Willful failure to register is a crime."
21

22 **COUNT FIFTEEN**

23 For a further and separate cause of action, being a different offense of the same class of crimes
24 and offenses as the charges set forth in Counts One through Fourteen hereof: On or about and
25 between April 28, 2015, and October 16, 2016, at and in the County of Sacramento, State of
26 California, the defendant, VICTOR MIROSHNICHENKO, did commit a felony, namely: a
27 violation of Section 288(a) of the Penal Code of the State of California, in that said defendant did
28 willfully, unlawfully, and lewdly commit a lewd and lascivious act, to wit, fingers to vagina in
29 [REDACTED] room (last time), upon and with the body and certain parts and members thereof of
30 [REDACTED] DOE, a child under the age of fourteen years, to wit, age 10-11 years, with the intent of
31 arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant
32 and the said child.
33

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

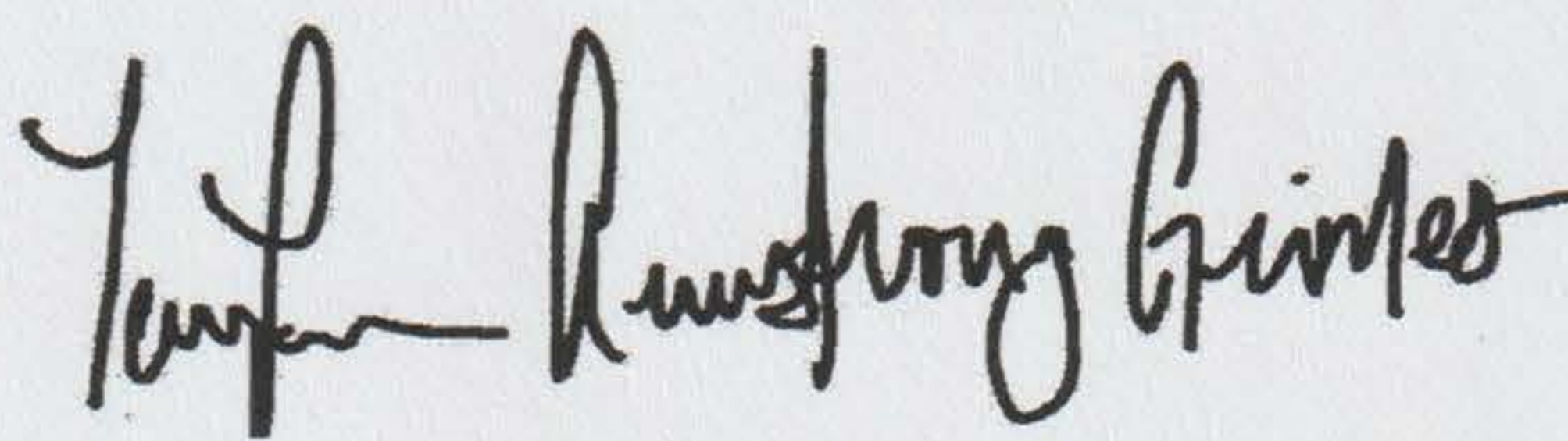
For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Fifteen hereof: On or about and between April 28, 2016, and September 1, 2016, at and in the County of Sacramento, State of California, the defendant, 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] DOE, 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

AB

