

SIM GILL, Bar No. 6389
District Attorney for Salt Lake County
CLAYE EPPERSON, Bar No. 19193
Deputy District Attorney
35 East 500 South
Salt Lake City, Utah 84111
(385) 468-7600
cepperson@saltlakecounty.gov
DAO# 24.003956

IN THE THIRD DISTRICT COURT, SALT LAKE DEPARTMENT
IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH

THE STATE OF UTAH

Plaintiff,

vs.

SERGIO LARA
DOB: 02/16/1975
AKA: SERGIO MEDINA LARA; 02/17/1971
4344 W Burwell Lane
Herriman, UT 84096
OTN#: 65329054
SO#: 199299
Booking#: 24009178

Defendant.

**AMENDED
INFORMATION**

DAO # 24.003956

Case No. 241902476

The undersigned Deputy District Attorney, upon a written declaration states on information and belief that the defendant, SERGIO LARA, committed the crime(s) of:

COUNT1

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused

was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching R.MG.'s breasts in the kitchen

COUNT 2

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching R.MG.'s butt in the kitchen

COUNT 3

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching R.MG.'s breasts prior to rape in the bathroom

COUNT 4

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five

separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching R. MG.'s butt before rape in the bathroom

COUNT 5

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching R.MG.'s breasts at the table

COUNT 6

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any

participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Forcing R. MG. to rub penis in bedroom

COUNT 7

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Forcing R.MG. to

touch penis at table

COUNT 8

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Forcing R.MG. to touch testicles in bedroom - first time

COUNT 9

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused

committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: To Wit: Forcing R.MG. to touch testicles in bedroom - last time

COUNT 10

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Forcing R.MG. to touch testicles in the kitchen

COUNT 11

SODOMY UPON A CHILD, 76-5-403.1, a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did engage in a sexual act upon or with a child under the age of 14, involving the genitals or anus of the actor or the child and the mouth or anus of either person, regardless of the sex of either participant. To Wit: Putting penis in R. MG.'s anus before rape in the bathroom

COUNT 12

SODOMY UPON A CHILD, 76-5-403.1, a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did engage in a sexual act upon or with a child under the age of 14, involving the genitals or anus of the actor or the child and the mouth or anus of either person, regardless of the sex of either participant. To Wit: Putting penis in R.MG.'s anus in the kitchen

COUNT 13

RAPE OF A CHILD, 76-5-402.1, a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did have sexual intercourse with a child under the age of 14. To Wit: Putting penis in R.MG.'s vagina in the bathroom

COUNT 14

RAPE OF A CHILD, 76-5-402.1, a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did have sexual intercourse with a child under the age of 14. To Wit: Putting penis in R.MG.'s vagina in the kitchen

COUNT 15

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Putting fingers in L.B.'s vagina in West Valley bedroom - First Time

COUNT 16

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Putting fingers in L.B.'s vagina in West Valley bedroom - Last Time

COUNT 17

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five

separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching L.B.'s vagina in his bedroom - first time

COUNT 18

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching L.B.'s vagina in his bedroom - last time

COUNT 19

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any

participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching L.B.'s breast in his bedroom

COUNT 20

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Forcing L.B. to

touch penis - the first time

COUNT 21

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Forcing L.B. to touch penis - last time

COUNT 22

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused

committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or (j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching L.B.'s vagina after her shower

COUNT 23

SODOMY UPON A CHILD, 76-5-403.1, a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did engage in a sexual act upon or with a child under the age of 14, involving the genitals or anus of the actor or the child and the mouth or anus of either person, regardless of the sex of either participant. To Wit: Licking L.B.'s vagina - first time

COUNT 24

SODOMY UPON A CHILD, 76-5-403.1, a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did engage in a sexual act upon or with a child under the age of 14, involving the genitals or anus of the actor or the child and the mouth or anus of either person, regardless of the sex of either participant. To Wit: Licking L.B.'s vagina - last time

COUNT 25

RAPE OF A CHILD, 76-5-402.1, a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did have sexual intercourse with a child under the age of 14. To Wit: Putting penis in L.B.'s vagina in his bedroom

COUNT 26

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Putting penis inside L.B.'s anus in the kitchen

COUNT 27

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Forcing L.B. to put penis inside mouth

COUNT 28

FORCIBLE SEXUAL ABUSE, 76-5-404, a Second Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , when the victim was 14 years of age or older and, under circumstances not amounting to rape, object rape, forcible sodomy, or attempted rape or forcible sodomy, the actor touches the anus, buttocks, pubic area, or any part of the genitals of another, or touches the breast of a female, or otherwise takes indecent liberties with another, with intent to cause substantial emotional or bodily pain to any individual or with the intent to arouse or gratify the sexual desire of any individual, without the consent of the other, regardless of the sex of any participant. To Wit: Forcing L.B. to touch penis in kitchen

COUNT 29

FORCIBLE SEXUAL ABUSE, 76-5-404, a Second Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , when the victim was 14 years of age or older and, under circumstances not amounting to rape, object rape, forcible sodomy, or attempted rape or forcible sodomy, the actor touches the anus, buttocks, pubic area, or any part of the genitals of another, or touches the breast of a female, or otherwise takes indecent liberties with another, with intent to cause substantial emotional or bodily pain to any individual or with the intent to arouse or gratify the sexual desire of any individual, without the consent of the other, regardless of the sex of any participant. To Wit: Touching L.B.'s vagina in the kitchen

COUNT 30

FORCIBLE SEXUAL ABUSE, 76-5-404, a Second Degree Felony, as follows: That on or about January 1, 2018 through December 13, 2021 in Salt Lake County, the defendant did , when the victim was 14 years of age or older and, under circumstances not amounting to rape, object rape, forcible sodomy, or attempted rape or forcible sodomy, the actor touches the anus, buttocks, pubic area, or any part of the genitals of another, or touches the breast of a female, or otherwise takes indecent liberties with another, with intent to cause substantial emotional or bodily pain to any individual or with the intent to arouse or gratify the sexual desire of any individual, without the consent of the other, regardless of the sex of any participant. To Wit: Grinding penis on L.B.'s butt in kitchen

COUNT 31

FORCIBLE SEXUAL ABUSE, 76-5-404, a Second Degree Felony, as follows: That on or about January 1, 2018 through December 13, 2021 in Salt Lake County, the defendant did , when the victim was 14 years of age or older and, under circumstances not amounting to rape, object rape, forcible sodomy, or attempted rape or forcible sodomy, the actor touches the anus, buttocks, pubic area, or any part of the genitals of another, or touches the breast of a female, or otherwise takes indecent liberties with another, with intent to cause substantial emotional or bodily pain to any individual or with the intent to arouse or gratify the sexual desire of any individual, without the consent of the other, regardless of the sex of any participant. To Wit: Forcing L.B. to touch penis while sister watched

COUNT 32

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching M.MG.'s breasts during 'remote' incident

COUNT 33

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused

committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching M.MG.'s vagina during 'remote' incident

COUNT 34

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Putting fingers inside M.MG.'s vagina during 'remote' incident

COUNT 35

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent

liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching M.MG.'s breasts in her bedroom

COUNT 36

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the

victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Touching M.MG.'s vagina in her bedroom

COUNT 37

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did , under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and(4)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping; (b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense; (c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense; (d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense; (e) the accused, prior to sentencing for this offense, was previously convicted of any sexual offense; (f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct; (g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense; (h) the offense was committed by a person who occupied a position of special trust in relation to the victim, as that term is defined in Section 76-5-404.1(1)(c); (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Putting penis between M.MG.'s thighs

COUNT 38

RAPE OF A CHILD, 76-5-402.1, a First Degree Felony, as follows: That on or about January 1, 2018 through December 31, 2021 in Salt Lake County, the defendant did have sexual intercourse with a child under the age of 14. To Wit: Putting penis in M.MG.'s vagina in her bedroom

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES:B. Johnson, D. O'Neil, L.B., R.MG., and M.MG.

DECLARATION OF PROBABLE CAUSE:

Your Declarant bases the Information upon the following:

Your affiant bases probable cause on information and evidence collected by Taylorsville Police

Department, Case No. 24-1642 and the following:

The statement of multiple victims under the age of 18 that from on or about January 01, 2018, to December 31, 2021, their great-uncle, who lived with them, SERGIO LARA sexually abused them in Salt Lake County.

The statement of 15-year-old R. MG. that from the time she was around 9 years old to 13 years old, LARA sexually abused and raped her. R.MG. stated that LARA approached her from behind in the kitchen and touched her breasts and butt. R.MG. stated that another time, LARA approached her in the bathroom and began touching her by rubbing her breasts and butt with his hands. LARA then pulled her pants down, R.MG. told him to stop, and LARA replied that he was not going to stop. LARA continued to put his penis in her anus, R.MG. told LARA this hurt and that she didn't like it. LARA then tried to put his penis in her vagina. She again told LARA to stop and that she didn't like it. R.MG. Stated another time, LARA was drunk, and she was sitting at the table. LARA approached and sat next to her and called her pretty. LARA began touching her thighs, then moved his hands under her shirt and bra, and touched her breasts, squeezing and 'playing with them'. R.MG. described another time that LARA raped her. R.MG. Stated she was in the kitchen and LARA approached her and was drunk again. LARA began hugging her and while he was doing this, pulled her pants down. LARA then pulled his own pants down and tried to insert his penis into her vagina. R.MG. stated that she felt LARA's penis trying to go into her vagina. LARA then put his penis in her 'butthole'. R.MG. told LARA "Stop", and "I don't like it.", and "It's hurting me." LARA did not stop. R.MG. recalled another time when LARA forced her to 'play' with his penis. R.MG. stated LARA closed the door to his room and told her to suck on his penis and she refused. LARA told her to play with it since she wasn't going to suck on it. LARA then grabbed her hand and put it on his penis and told her to rub it until he told her to stop. R.MG. explained another time, she was sitting at the table and LARA sat next to her. LARA 'told her to do it' and grabbed her hand. LARA placed her hand on his penis and told her to rub it even if she didn't like it, until he told her to stop. R.MG. stated that sometimes LARA would make her 'play with his balls'. LARA grabbed her hand and placed it on his testicles and made her 'play' with them. R.MG. stated this happened multiple times in LARA's bedroom and once in the kitchen.

The statement of 14-year-old M.MG. that from the time she was around 8 years old to 12 years old, LARA sexually abused and raped her. M.MG. explained one time that LARA asked her to help him grab a remote control that he couldn't get. M.MG. stated that LARA then touched her body parts. M.MG. explained that those body parts were her breasts and vagina. M.MG. told LARA to stop, and he didn't. M.MG. also stated that LARA put his fingers inside her vagina and put his penis between her thighs. M.MG. stated there was another time that LARA came into her room and began touching her. M.MG. told LARA to stop and LARA told her if she told her parents something bad would happen to them. M.MG. stated that LARA touched her breasts and vagina. M.MG. said that after she told LARA to stop, he pulled his pants down and tried to put his penis in her vagina.

The statement of 18-year-old L.B. that from the time she was around 12 years old to 15 years old, LARA sexually abused and raped her. L.B. stated that the first time that LARA touched her, she had just got out of the shower, and LARA came up behind her and wrapped his arms around her and rubbed her vagina. L.B. told LARA to leave her alone. L.B. stated that LARA would ask for help with his TV, then lock the door to his room while she was inside with him. L.B. stated

that LARA would have her sit down and he would show her underwear from a backpack that had girls' clothes in it. LARA would then pull her pants down, open her legs, and touch her vagina with his hands and penetrate her with his fingers. LARA then licked her vagina. LARA would also make L.B. touch his penis over his underwear. L.B. stated this happened more than one time. L.B. stated that one time when LARA shut her in his room, LARA put his hand under her shirt and grabbed her boob, both over and under her bra, then he removed her pants. LARA then began touching her vagina with his hands and penetrated her vagina with his fingers. LARA then began licking her vagina. LARA pulled his shorts down and made L.B. touch his 'things' over his underwear. LARA then got on top of her and pulled his underwear down. LARA separated her legs with his hands and attempted to put his 'thing' inside of her. L.B. stated that his 'private spot' was hard and he started rubbing it on her 'clit' and tried putting it inside her. LARA told her that he was going to be her first time and that it was going to hurt, but only for a little bit. L.B. told LARA "I don't want to do this. I don't want to do this." L.B. explained that LARA's 'private spot' is his 'dick'. L.B. stated that in a different home they lived in, there was one time that she came into the kitchen at night and LARA was playing with his dick at the kitchen table. LARA came up to L.B. and told her he was hard. LARA then grabbed L.B.'s hand and put it in his shorts. L.B. explained another time when LARA came into the kitchen while she was getting food. LARA came up behind her and whispered in her ear "You look so good". L.B. could feel LARA's penis on her back. LARA put his hand in her pants and began touching her vagina, while he rubbed his dick on her butt. LARA then took off L.B.'s pants and underwear and grabbed her and put his penis in her anus. L.B. explained that there was another time in LARA's bedroom that he made her touch him while one of her sisters watched. LARA pulled down his pants and underwear, grabbed L.B.'s hand, placed it on his dick, and made her grab it. L.B. stated she remembered that LARA's dick smelled bad, and she felt like throwing up. LARA then pushed L.B.'s head onto his penis with his hand on the back of her head and L.B. choked. L.B. stated that LARA made M.MG. watch all of this. L.B. stated that there were times that LARA would unbutton her pants and slip his hand in and touch her vagina. L.B. also stated that LARA would slap her butt.

LARA stated post-Miranda that he did live with the victim's family in two homes in Salt Lake County, for about three years from 2018 to 2021. LARA further stated that there were times that he was alone with the girls, while their parents were not home.

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Sarah Claye Epperson

Sarah Claye Epperson

Deputy District Attorney

23rd day of January, 2025 / SCE / DAO# 24.003956